



# **SPEEDLINK INSTITUTE OF TECHNOLOGY AND INNOVATIONS (SITI)**

Policy and Procedure: Copyright and Data Protection policy and Procedure

Policy Number: SITI-LEG-CDP-001

Version: 1.0

Effective Date: 1st, February 2026

Approved By: SITI Board of Directors

# 1. Purpose

To ensure that SITI:

- Protects its own intellectual property (training materials, curricula, recordings, brand assets) and respects the copyright of third parties.
- Processes personal data of students, staff, tutors, and partners lawfully, transparently, and securely.
- Complies with Nigerian copyright law (Copyright Act 2022) and data protection regulations (Nigeria Data Protection Regulation – NDPR 2019, and the Nigeria Data Protection Act 2023).
- Prevents unauthorised use, sharing, or exploitation of SITI’s proprietary content and personal information.

This policy upholds SITI’s core values of Integrity (respecting rights) and Innovation (safeguarding creative work).

# 2. Scope

This policy applies to:

- All SITI employees, tutors, contractors, and volunteers (anyone creating, using, or accessing SITI content or personal data).
- All students (with respect to use of SITI materials and handling of their own data).
- All third parties (partners, vendors, corporate clients) who receive SITI materials or personal data.
- All types of content: lecture recordings, slides, handouts, LMS materials, assessment papers, software code, business development plans, marketing flyers, website content, and SITI logo.
- All personal data collected during registration, training, events, and post-graduation activities.

This policy does not cover:

- Employment contracts (separate confidentiality clauses).
- Patent or trademark registration (handled on a case-by-case basis).

### 3. Definitions

Term	Definition
Copyright	The exclusive legal right to reproduce, publish, distribute, and adapt an original work (literary, artistic, musical, or software).
SITI Intellectual Property (IP)	All materials created by SITI staff or tutors in the course of their engagement, including curricula, lesson plans, slides, lecture recordings, assessment papers, LMS content, software code, business processes, and the SITI name/logo.
Student Work	Original work created by a student during their studies (e.g., Business Development Plan, code project, presentation). Copyright of student work generally belongs to the student, with limited licence to SITI.
Personal Data	Any information relating to an identified or identifiable natural person (e.g., name, email, phone number, ID number, address, bank details, medical information, LMS usage logs).
Data Controller	SITI (the institute) – determines the purposes and means of processing personal data.
Data Processor	A third party that processes personal data on behalf of SITI (e.g., LMS hosting provider, cloud storage provider).

Data Subject	The person whose personal data is processed (e.g., student, staff member).
Consent	Freely given, specific, informed, and unambiguous indication of the data subject's agreement to processing of their personal data.
Data Breach	A security incident leading to accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data.
Third Party	Any external organisation or individual not employed by SITI.

## 4. Policy Statement – Copyright

SITI asserts ownership of all materials created by its employees and tutors in the course of their duties (under Nigerian copyright law, works made in the course of employment belong to the employer, unless otherwise agreed in writing). SITI grants limited licences to students and partners for educational use.

SITI respects third-party copyright and will not use materials without permission or proper attribution.

### 4.1 Ownership of SITI Intellectual Property

Category	Owner	Permitted Use by Others
Curricula, lesson plans, slides, handouts	SITI	Tutors may use for delivering SITI courses; students may access via LMS for personal study. No redistribution.

Lecture recordings (video/audio)	SITI	Uploaded to LMS and SITI YouTube channel (select content). Students may stream, not download or share.
Assessment papers, exam questions	SITI	For internal use only. Not to be shared outside SITI.
SITI logo, name, branding materials	SITI	No external use without written permission from Training Coordinator.
Student projects (BDP, code, presentations)	Student (with licence to SITI)	SITI may use for internal quality assurance, showcase during Graduation Week, and (with student consent) publish on website/social media as examples.

## 4.2 Permitted Use by Students

Students may:

- Access SITI materials (slides, recordings, handouts) on the LMS for personal study.
- Take notes and create personal summaries.
- Reference SITI materials in their own work with proper citation.

Students may not:

- Copy, reproduce, or redistribute SITI lecture recordings, slides, or handouts to non-enrolled persons (including sharing on social media, WhatsApp groups outside the official cohort, or file-sharing sites).
- Sell SITI materials or use them for commercial tutoring.
- Record lectures without explicit written permission from the Training Coordinator (SITI already records all lectures; student recordings are prohibited).

- Use the SITI logo or name to imply endorsement of external products or services.

### **4.3 Use of Third-Party Copyrighted Materials**

Tutors and staff must:

- Obtain permission or a licence before using third-party copyrighted content (images, code snippets, articles, videos) in SITI training materials.
- Provide proper attribution (author, source, licence type) for any open-source or Creative Commons content.
- Not use pirated software, fonts, or media.

If a third party alleges copyright infringement by SITI, the Training Coordinator will investigate and, if valid, remove the infringing content and issue an apology or compensation as required by law.

### **4.4 Student Copyright in Their Own Work**

- Students retain copyright in their original projects (Business Development Plans, code repositories, design work).
- By enrolling at SITI, students grant SITI a non-exclusive, royalty-free, perpetual licence to:
  - Use the student's work for internal quality assurance and accreditation purposes.
  - Display the work during Graduation Week and other SITI events.
  - (With explicit consent) publish the work on SITI's website, social media, or promotional materials.
- Students may publish their own work elsewhere after the program, provided they do not use SITI's confidential assessment criteria or proprietary materials.

## **5. Policy Statement – Data Protection**

SITI is a Data Controller under the Nigeria Data Protection Act 2023. SITI is committed to processing personal data lawfully, fairly, and transparently, and to protecting data from unauthorised access, loss, or misuse.

### **5.1 Data Protection Principles**

SITI adheres to the following principles (derived from NDPR/NDPA):

Principle	SITI Implementation
Lawfulness, fairness, transparency	Data subjects are informed (via this policy and Privacy Notice – Appendix A) of what data is collected and why.
Purpose limitation	Data is collected only for specified, explicit, and legitimate purposes (registration, training, certification, communication).
Data minimisation	Only data necessary for the stated purpose is collected.
Accuracy	Data is kept accurate and up-to-date; data subjects may request corrections.
Storage limitation	Data is retained only as long as necessary (per retention schedule in Section 11).
Integrity and confidentiality	Appropriate technical and organisational measures protect data against breaches.
Accountability	SITI documents its processing activities and can demonstrate compliance.

## 5.2 Types of Personal Data Collected

Category	Examples	Purpose
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Identity data	Full name, date of birth, government ID number, photograph	Registration, ID card, certificate, verification.
Contact data	Email, phone number, address, emergency contact	Communication, emergency response.
Academic data	Enrollment form, attendance records, grades, LMS activity, project submissions	Training delivery, assessment, certification.
Financial data	Payment receipts, scholarship award letters	Fee processing, scholarship management.
Technical data	LMS login logs, IP addresses, device information	System security, troubleshooting.
Special category data (with explicit consent)	Disability information (for accommodation), health information (for medical emergencies)	Reasonable accommodation, welfare support.

### 5.3 Legal Basis for Processing

SITI processes personal data based on one or more of the following:

- Contractual necessity: Processing required to enrol and train the student (e.g., attendance records, grading).
- Legal obligation: Retention of records for tax or regulatory purposes.
- Legitimate interests: Improving SITI's services, preventing fraud, ensuring security (balanced against the data subject's rights).
- Consent: For optional processing (e.g., publishing student work on social media, sending marketing communications). Consent can be withdrawn at any time.

## 6. Data Protection Procedures

### 6.1 Collection and Consent

- At registration (Enrollment Form – Appendix A of Learner Registration Policy), students receive a Privacy Notice (Appendix A of this policy) explaining data processing.
- Explicit consent is obtained (via tick box) for:
  - Use of student’s project or photograph in marketing materials.
  - Sending promotional emails/SMS (separate from essential course communications).
  - Processing special category data (disability, health) where voluntarily provided.
- Consent records are stored with the student master file.

### 6.2 Data Access and Security

- Access control: Student personal data is accessible only to authorised SITI staff (Admin, Training Coordinator, Technical Team) on a need-to-know basis. Tutors see only academic data (grades, attendance, LMS activity), not ID copies or financial data.
- LMS security: LMS is hosted on a secure platform with encryption in transit (HTTPS) and at rest. Passwords are hashed.
- Physical security: Physical student files are kept in locked cabinets in Admin office. Access is logged.
- Data processing agreements (DPAs): SITI signs DPAs with any third-party processor (e.g., LMS provider, cloud backup service) that contractually obligates them to NDPR/NDPA standards.

### 6.3 Data Subject Rights

Data subjects (students, staff) have the following rights. Requests must be made in writing to the Training Coordinator (or Data Protection Officer, if appointed).

Right	Description	SITI Response Time
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Right to access	Obtain confirmation of whether data is processed, and receive a copy.	Within 15 working days.
Right to rectification	Correct inaccurate or incomplete data.	Within 10 working days.
Right to erasure (right to be forgotten)	Request deletion of data, subject to legal retention obligations (e.g., grades, financial records).	Within 30 working days (partial deletion may apply).
Right to restrict processing	Limit processing while a dispute is resolved.	Within 10 working days.
Right to data portability	Receive data in a structured, machine-readable format (for data provided by consent or contract).	Within 15 working days.
Right to object	Object to processing based on legitimate interests (e.g., direct marketing).	Within 10 working days.
Right to withdraw consent	Withdraw previously given consent (e.g., marketing).	Immediate effect (processing stops).

Requests are logged in a Data Subject Request Register (Appendix B). No fee is charged unless the request is manifestly unfounded or excessive.

## 6.4 Data Breach Management

Definition: A breach includes unauthorised access, loss, theft, accidental deletion, or improper disclosure of personal data.

Procedure:

Step	Action	Responsible	Timeline
1	Discover breach (e.g., lost laptop, hacked email, unauthorised staff access).	Any staff	Immediately.
2	Contain the breach (e.g., change passwords, disable account, retrieve lost device).	Technical Team / Admin	Within 1 hour.
3	Notify Training Coordinator (or Board Secretary if Coordinator implicated).	Discoverer	Within 2 hours.
4	Assess risk to data subjects (e.g., financial data, health data).	Training Coordinator	Within 24 hours.
5	If high risk (e.g., financial data, large volume), notify affected data subjects and provide advice (e.g., change passwords, monitor accounts).	Training Coordinator	Within 48 hours.
6	Report breach to Nigeria Data Protection Commission (NDPC) within 72 hours (mandatory for certain breaches).	Training Coordinator	Within 72 hours.

7	Document breach (root cause, affected persons, corrective actions) in Breach Register (Appendix C).	Training Coordinator	Within 7 days.	7
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Failure to report a known breach by a staff member is a disciplinary offence.

## 6.5 Data Retention and Disposal

Per the retention schedule below (aligned with main SOP Section 5.1). At the end of retention, data is securely destroyed:

- Physical documents: Shredded.
- Digital data: Securely deleted (overwritten or degaussed for hard drives; permanent deletion from cloud with no restore).

Data Type	Retention Period	Disposal
Student master files (including ID copies, enrollment forms)	5 years post-graduation/withdrawal	Shred / secure delete
Academic records (grades, attendance)	5 years post-graduation	Secure delete
LMS user data (excluding archived course content)	3 years after last login	Anonymise then delete
Financial records (payment receipts)	5 years (tax requirement)	Shred
Marketing consent records	Until consent withdrawn + 2 years	Secure delete
CCTV footage (if any)	30 days (unless incident)	Overwrite

## 7. Copyright Infringement and Data Breach Consequences

### 7.1 Violations by Students

Violation	Consequence
Sharing SITl lecture recordings or slides externally	Written warning; repeat offence may lead to expulsion (per Malpractice Policy).
Using SITl materials for commercial tutoring without permission	Immediate expulsion and legal action for damages.
Unauthorised access or sharing of other students' personal data	Disciplinary action up to expulsion; may be reported to NDPC.

### 7.2 Violations by Staff or Tutors

Violation	Consequence
Using unlicensed third-party content in SITl materials	Written warning; removal of content; repeat offence may lead to termination.
Disclosing student personal data without authorisation	Immediate termination and possible legal liability (civil and criminal under NDPA).
Failure to report a data breach	Disciplinary action up to termination.

## 8. Training and Awareness

- All staff and tutors must read and acknowledge this policy (and sign a Confidentiality Agreement per Learner Registration Policy, Appendix B).

- Students receive a summary of copyright and data protection during orientation, including their obligations not to share LMS materials.
- Annual refresher training for staff on data protection (handling personal data, breach reporting).

## 9. Roles and Responsibilities

Role	Copyright & Data Protection Responsibilities
Training Coordinator	Overall compliance; handles data subject requests; reports breaches; maintains registers; appoints a Data Protection Officer (DPO) if required (SITI may outsource DPO function).
Admin Staff	Ensure consent is obtained at registration; restrict access to physical files; assist with data subject requests.
Technical Team	Implement security measures (encryption, access controls); monitor LMS for unauthorised sharing; assist with breach containment.
Tutors	Respect copyright (do not use unlicensed materials); keep student grades confidential; report any suspected data breach.
All Staff	Do not share student personal data on personal devices or unsecured channels (e.g., personal WhatsApp).

## 10. Third-Party Data Sharing

SITI may share personal data with third parties only under the following conditions:

Recipient	Data Shared	Legal Basis
LMS hosting provider	Names, email, LMS activity	Data Processing Agreement in place.

EC-Council certification)	(for	Student program status	names, completion	Contractual necessity.
Corporate client sponsored students)	(for	Attendance progress reports	and	Contract informed). (student
Law enforcement		As required by court order		Legal obligation.

Any other third-party sharing requires the student's explicit written consent.

## 11. Documentation and Records

Record		Responsible	Retention
Privacy acknowledgments (signed by students)	Notice	Admin	5 years
Data Subject Register	Request	Training Coordinator	5 years
Data Breach Register		Training Coordinator	5 years
Data Agreements (with vendors)	Processing (with	Training Coordinator	Duration of contract + 3 years
Staff confidentiality acknowledgments		Admin	Duration of employment + 3 years

## 12. Reporting

The Training Coordinator includes in the monthly report to the Board (per main SOP Section 5.2):

- Number of data subject requests received and resolved.
- Any data breaches (summary, anonymised if needed).
- Copyright complaints received (internal or external).
- Compliance training completed by staff.

An annual data protection compliance report is submitted to the Nigeria Data Protection Commission (NDPC) if required (thresholds apply).

### **13. Related Documents and Policies**

- SITI Comprehensive SOP (Version 2.0, April 2026)
- SITI Learner Registration and Administration Policy (for data collection at enrollment)
- SITI Malpractice and Maladministration Policy (for unauthorised sharing of materials)
- SITI Code of Conduct for Students (to be developed)
- Nigeria Data Protection Act 2023
- Copyright Act 2022 (Nigeria)

### **14. Policy Review**

This Copyright and Data Protection Policy will be reviewed annually or whenever there is a material change in Nigerian data protection law, a significant data breach, or a copyright dispute.

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## **Appendix A: Student Privacy Notice (Short Form)**

*(Provided to all students at registration, included with Enrollment Form)*

SITI Privacy Notice

SITI collects and processes your personal data for the following purposes:

- Registration, training delivery, assessment, and certification.
- Communication (course updates, emergencies).
- Compliance with legal obligations (tax, audit).
- Improvement of SITI services (anonymous analytics).

We do not sell your data to third parties. We share data only with trusted processors (e.g., LMS provider) under strict confidentiality agreements.

You have the right to access, correct, or request deletion of your data (subject to legal retention). Contact the Training Coordinator at [email].

For marketing communications and publication of your work, we will ask for separate consent.

Full policy available at [www.speedlinkinstitute.org/privacy](http://www.speedlinkinstitute.org/privacy).

I acknowledge receipt of this Privacy Notice. Signature: \_\_\_\_\_ Date: \_\_\_\_\_

## Appendix B: Data Subject Request Register

Request ID	Date	Data Subject Name	Request Type (Access/Rectify/Delete/Other)	Status (Open/Completed/Denied)	Response Date	Notes

## Appendix C: Data Breach Register

Breach ID	Date Disclosed	Description of Breach	Data Subjects Affected (number)	Role of Cause	Containment Action	NDPC Notified (date)	Data Subjects Notified (date)	Corrective Actions