



ZANKLI MEDICAL CENTRE - COOKIE POLICY

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1. INTRODUCTION

1.1 Purpose of This Policy

This Cookie Policy explains in detail how Zankli Medical Centre ("we", "us", or "our") utilizes cookies and similar tracking technologies when you visit our website at [www.zanklimedical.com] and any other websites or online services we operate (collectively

referred to as the "Website"). This document provides extensive information about cookies: their nature, functionality, and the specific purposes for which we use them. It also outlines how users can manage their cookie preferences and exercise their data protection rights in relation to cookies.

In addition, this Policy explains your rights under the **Nigeria Data Protection Act 2023 (NDPA)**, the **Nigeria Data Protection Regulation 2019 (NDPR)**, and any other relevant data protection legislation.

1.2 Scope of This Policy

This Cookie Policy applies to all individuals interacting with our Website, including but not limited to patients, healthcare professionals, job applicants, vendors, service providers, and visitors. The Policy covers all cookies deployed on the Website, whether placed by Zankli Medical Centre directly or by carefully vetted third-party service providers operating on our behalf.

1.3 Relationship to Other Policies

This Cookie Policy is a critical component of Zankli Medical Centre's comprehensive data protection framework. It should be read in conjunction with our:

- Privacy Policy
- Data Protection Policy
- Information Security Policy

Together, these documents demonstrate our commitment to lawful, fair, and transparent handling of all personal data, including that collected through cookies.

1.4 Compliance Statement

Zankli Medical Centre affirms its commitment to full compliance with:

- Nigeria Data Protection Act 2023 (NDPA)
- Other sector-specific healthcare privacy regulations

We ensure that all cookie-related processing activities meet both the letter and spirit of applicable data protection laws.

2. WHAT ARE COOKIES

Cookies are small text files that are stored on your device (computer, smartphone, tablet, or other connected devices) when you visit a website. They perform a variety of functions, such as enabling the Website to recognize your device, remembering your preferences, and helping website owners understand how visitors interact with their site.

Cookies can be categorized based on their origin (first-party or third-party), lifespan (session or persistent), and function (essential, analytics, marketing, etc.). In addition to traditional cookies, our Website may use other tracking technologies including:

- **Local Storage:** Data stored locally on your browser without an expiration date.
- **Session Replay Technologies:** Systems that record and analyze user interactions on our Website for quality improvement.
- **Fingerprinting Technologies:** Techniques that collect unique device attributes to identify users anonymously.

Cookies may collect identifiers such as:

- Unique cookie IDs
- IP addresses (anonymized when legally required)
- Device characteristics and browser types
- Operating system details
- Referrer URLs

3. HOW WE USE COOKIES

Zankli Medical Centre uses cookies to achieve a wide range of legitimate purposes. The principal objectives are:

- **Operational Necessity:** Ensuring core Website functionalities such as secure login, session continuity, and booking of medical appointments.
- **Performance and Analytics:** Gaining insights into how users interact with our Website, which helps us optimize navigation, content delivery, and user engagement.
- **Personalization:** Remembering user preferences such as language settings, preferred locations, and accessibility options.
- **Security:** Protecting the Website and its users by detecting fraudulent activities and maintaining the integrity of healthcare-related information.
- **Compliance Monitoring:** Ensuring cookie practices comply with national and international data protection requirements.

The use of cookies enables us to deliver a personalized, efficient, and secure online experience to all Website visitors.

4. TYPES OF COOKIES WE USE

We utilize the following categories of cookies:

- **Essential Cookies:** These cookies are critical for Website operation. Without them, basic functionalities like page navigation, secure login, and form submissions would not work. Consent for these cookies is not required as per the NDPA and NDPR.
- **Preference Cookies:** These cookies allow the Website to remember choices you make, such as your language or region, providing a more tailored experience.
- **Analytics Cookies:** Used to gather statistical data regarding Website traffic and user interactions, helping us continuously improve our Website.
- **Marketing/Targeting Cookies:** Designed to build a user profile and deliver personalized marketing content, healthcare campaigns, and event promotions.
- **Functional Cookies:** Enable additional functionality like live chat services, feedback collection, and access to healthcare resource directories.

Each type of cookie is deployed only after obtaining the appropriate level of user consent, except for essential cookies.

5. MANAGING COOKIES

Visitors to our Website have the right to control their cookie settings at any time. Upon first visit, a cookie consent banner will:

- Clearly inform users about the types of cookies we use
- Offer choices to "Accept All", "Accept Essential Only", or "Customize Settings"
- Link directly to this detailed Cookie Policy

Users can modify their consent preferences subsequently by clicking on "Cookie Settings" in the Website footer. In addition, most web browsers allow manual cookie control through their settings. Instructions are available for popular browsers like Chrome, Firefox, Safari, Edge, and Opera.

Disabling cookies may impact Website functionality, including limited access to patient portals and appointment booking features.

6. COOKIES USED ON OUR WEBSITE

We maintain a comprehensive inventory of all cookies deployed, detailing:

- Name
- Type (first-party or third-party)
- Provider
- Purpose
- Retention duration
- Cookie category

This inventory is reviewed and updated quarterly to ensure continued accuracy and transparency.

7. THIRD-PARTY COOKIES

We partner with third-party service providers that may deploy cookies for analytics, performance monitoring, appointment scheduling, and user interaction enhancements. Although we do not directly control these cookies, we ensure that our partners:

- Sign Data Processing Agreements (DPAs)
- Comply with the NDPA, NDPR, and international best practices
- Demonstrate robust privacy and security measures

8. COOKIE CONSENT

We obtain clear, informed, and affirmative consent for the placement of any non-essential cookies. Our consent practices include:

- A user-friendly banner upon initial visit
- Categorization of cookie types for granular consent
- Access to detailed cookie descriptions
- Mechanisms for easy withdrawal of consent

Consent records are maintained securely and updated whenever the Cookie Policy is materially changed or every 12 months.

9. CHANGES TO OUR COOKIE POLICY

This Cookie Policy is subject to periodic review and update to reflect evolving legal requirements, changes in Website functionality, and industry best practices. Significant changes will be communicated to users via Website notifications, and where necessary, renewed consent will be obtained.

A version history log is maintained to document all amendments.

10. COOKIE POLICY AND DATA PROTECTION

Information collected through cookies may constitute personal data. Therefore, we ensure that:

- Processing is based on lawful grounds
- Data minimization principles are adhered to
- Processing is fair, transparent, and respectful of your rights

Under the NDPA and NDPR, you are entitled to:

- Access your data
- Correct inaccuracies
- Request deletion
- Restrict processing
- Data portability
- Object to processing
- Withdraw consent
- Lodge complaints with regulatory authorities

11. CONTACT INFORMATION

If you have any questions, concerns, or requests regarding this Cookie Policy or your rights under Nigerian data protection laws, please contact our:

Data Protection Officer (DPO)
Zankli Medical Centre

No 1, Ibrahim Tahir Lane, Utako, Abuja, Nigeria
Email: dpo@zanklimedicalcentre.org
Phone: +2348146666829

You may also lodge a complaint with the **Nigeria Data Protection Commission (NDPC)** if dissatisfied with our response.

12. LEGAL BASIS

Our cookie processing activities are justified under:

- The Nigeria Data Protection Act 2023 (NDPA)
- The Nigeria Data Protection Regulation (NDPR) 2019
- Relevant healthcare and ICT sector-specific laws

We distinguish between cookies requiring legitimate interest justification and those requiring explicit consent.

13. INTERNATIONAL TRANSFER OF COOKIE DATA

Where cookie data is transferred outside Nigeria, we ensure compliance with cross-border data transfer rules by implementing:

- Standard Contractual Clauses (SCCs)
- Additional technical safeguards like encryption

Users are informed about the destination countries and risks associated with international data transfers.

14. RETENTION OF COOKIE DATA

Cookie data is retained for periods appropriate to its purpose:

- Session cookies expire after browser closure
- Persistent cookies have specific expiration dates (e.g., 30 days, 1 year, 2 years)
- Data retention practices are aligned with the principles of data minimization and purpose limitation.

15. SECURITY OF COOKIE DATA

We prioritize the security of cookie-related data by implementing:

- End-to-end encryption (TLS)
- Secure cookie attributes (Secure, HTTPOnly, SameSite)
- Access control and authentication mechanisms
- Routine vulnerability assessments and penetration testing
- Staff training on cyber hygiene and data protection

Special security measures are applied for healthcare-related cookies.

16. COOKIE COMPLIANCE MONITORING

We conduct:

- Quarterly audits of cookie inventories
- Regular reviews of consent mechanisms
- Data Protection Impact Assessments (DPIAs) where applicable

We remain committed to upholding the highest standards of accountability, transparency, and data protection compliance.

Document End

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