



Data Protection, Confidential and Privacy Policy	Policy Ref. No: SAHARA - 101
	Effective Date:
Policy Owner	Policy Ref. No: SAHARA - 101

1 PURPOSE

- 1.1** To outline a framework for Sahara Group Limited and/or its affiliates (otherwise referred to as “the Company” or “SGL”) whereby information and data provided by employees, clients, contractors, partners and any other third party (“Data Subjects”) to the Company are managed appropriately and in compliance with the Nigerian Data Protection Regulation. It is also to ensure the proper and efficient management of confidential information.
- 1.2** This Policy applies to the Board, Management, Employees, Contractors, Suppliers, Clients and Partners of SGL and all related entities.

2 POLICY

- 2.1** The Company hereby states that it shall safeguard the rights to data privacy, foster safe conduct for transactions involving the exchange of personal data, prevent manipulation of personal data of any person whose personal information it collects or keeps in the course of its operations.
- 2.2** Employees and all third parties to whom the Company relates must also keep confidential any information of value belonging to SGL or whose premature disclosure would help competitors or harm the Company. Confidential information includes but is not limited to: actual and forecasted financial results, ideas, Design data and information, Processes, formulae, systems, programs and complications, Research and development, Information regarding finances, Actual or potential customer lists, Plans, New product information, Strategies, Information regarding legal proceedings, Market share data, trade secret.
- 2.3** ‘Personal information’ or ‘data’ is any information relating to an identified person or identifiable natural person, either directly or indirectly in particular by reference to for e.g. a name, number, location data, online identifier or any factor specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person. Data relating to religious or other beliefs, sexual orientation, health, race, ethnicity, political views, trade union membership, criminal records, etc. are also included. Therefore names, addresses, photographs, email addresses, bank details, social media posts, medical information, IP address, phone numbers, IMEI number, etc. may suffice here.

2.4 "Data processing" means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction;

2.5 Proper management of confidential information is critical to the success of the Sahara Group. Employees are often entrusted with, or in the course of their duties become aware of trade secrets and proprietary information not generally known to the public. This type of information, whether or not subject to intellectual property rights, is considered confidential and is to be protected by all employees and other former employees. Any unauthorized disclosure of Company proprietary or confidential information is prohibited and would lead to disciplinary and/or legal actions in line with the Company's sanction grid, where such unauthorised disclosures are made by anyone bound by this policy and the Company's policy on the protection and use of Company assets, resources and information.

2.6 All information herein referred to may be obtained and stored electronically or verbally.

3. OBLIGATIONS

- a) The Company will ensure that consent of the Data Subject is first obtained before data collection and processing of same will occur after full disclosure of the specific purpose for collection is provided and without fraud, coercion and undue influence.
- b) The Company however states that consent may be withdrawn at any time by the Data Subject
- c) Where data is to be transferred to a third party for whatever reason, the Company will inform the Data Subject accordingly.
- d) The Company will take reasonable measures to ensure its service providers do not have a record of violating the rights of Data Subjects'.
- e) The Company shall ensure that data is protected and secured in the most possible way.
- f) All contractual relationships with third parties involving Data processing will be guided by written agreements, and the Company will take steps to ensure adherence and compliance to the Data protection rules.
- g) The Company hereby states that Data Subjects are entitled to lodge complaints with the National Information Technology Development Agency (NITDA) where the company does not act on requests made or consents withdrawn.
- h) The Company shall ensure that all regulatory disclosures (data processing and protection audit reports) are made to NITDA.

Before requesting for data from Data Subjects, SGL will provide the following:

- Its identity and contact details
- The contact details of its Data Protection Officer
- The legal basis and purpose of data processing.
- Its legitimate interests as a company
- The recipients or category of recipients of the personal data.
- Whether it is a statutory obligation or contractual requirement or if any, the possible consequences of failure to provide the data
- The existence or not of automated decision making including profiling as well as the significance and envisaged consequences of such processing for the data subject
- Information as to whether there will be further processing of the personal data and the further purpose other than that for which it was collected, with any relevant information.
- That it is obliged to delete or restrict processing of personal data upon request by the data subject based on certain grounds to be provided where requested by you to the Data Protection Officer at corp.gov@sahara-group.com within a month of your request