



BUA FOODS PLC PRIVACY POLICY

Introduction

As part of our operations, BUA Foods Plc ("**BUA Foods**", "**the Company**", "**we**" or "**us**") collect and process certain types of information of individuals, visitors to the website, enquirers, etc. ("**Data Subject**" or "**you**" or "**your**") that makes them easily identifiable. We understand the value of your Personal Data we are committed to preserving, protecting, and safeguarding the Personal Data you share with us.

This Privacy Policy has been published to better serve those who are concerned with how their Personal Data is being used by BUA Foods, and it outlines the data we collect from you, why we collect such data, how we use the data, how you can control your data, and how we manage, store, protect, share, retain or delete your information. This Privacy Policy will inform you as to how we look after your data when you visit our website (regardless of where you visit it from) and inform you about your privacy rights and how the law protects you.

This Privacy Policy also restates our commitment to protect your data on our website, social media platforms, administrative records, cloud storage, and whenever you visit our physical premises.

This Privacy Policy is issued by BUA Foods Plc and only applies to the activities of BUA Foods Plc and not those of its affiliates.

Consent

By using our website (or by ticking the consent box below) you agree to the terms of this Privacy Policy, as to allow us to utilise your data to serve you more accurately.

It is important that you read this Privacy Policy together with any other policy or fair processing policy we may provide on specific occasions when we are collecting or processing Personal Data about you so that you are fully aware of how and why we are using your data. This Privacy Policy complements other notices and policies and is not intended to override them.

By accessing the services of BUA Foods and voluntarily providing us with the requested Personal Data, you consent to the collection and use of the information in accordance with this Privacy Policy. Your consent can be withdrawn at any time by sending a request to that effect to the contact information supplied below. If you do not consent to the collection, use, or disclosure of your personal information as outlined in this policy, please do not provide any personal information to BUA Foods.

By consenting to this policy, you are assumed to be of legal age for the purpose of using this website within the relevant country from where you access this website.

Scope of this Privacy Policy

Please note that this Privacy Policy applies to the BUA Foods main web pages (i.e. those in <https://www.buafoodsplc.com/>) and generally to the business of BUA Foods. If you follow a link to any other website, please check to confirm their policies before you submit any personal information to those websites.



This Privacy Policy is not intended for children. We do not provide services or undertake business with children, and we do not knowingly collect data relating to children, except where we collect data of dependents, next-of-kin, or in other representative capacity from data subjects.

Guiding Principles

BUA Foods is committed to maintaining the principles in the Nigerian Data Protection Regulation (NDPR) and other applicable privacy and data protection laws regarding the processing of Personal Data.

The collection and processing of your Personal Data shall be in accordance with the legitimate and lawful purpose consented to and shall only be stored for the period, which is reasonably required, provided also that your Personal Data shall be adequately secured against foreseeable hazards within our contemplation.

To demonstrate this commitment as well as our aim of creating a positive privacy culture within BUA Foods, BUA Foods adheres to the following basic principles relating to the processing of Personal Data: lawfulness, fairness, and transparency; data accuracy; purpose limitation; data minimization; storage limitation; integrity and confidentiality; and accountability.

What Type of Information Do We Collect?

The type of information we collect is Personal Data. Personal Data refers to any piece of information that relates to an identified or identifiable living individual or pieces of information, which if collated together can lead to the identification of a person.

Personal Data includes data such as email address, phone number, full name, account details, home address, driver's license number, bank account number, passport number, etc pertaining to a natural person. It does not include data provided anonymously.

The type of Personal Data we may collect are as follows:

- i. **Identity Data:** includes data such as first name, maiden name, last name, social media username or similar identifier, marital status, title, date of birth, next-of-kin data, biometric data, and gender.
- ii. **Contact Data:** includes data such as a home address, email address, and telephone number.
- iii. **Technical Data:** includes data such as internet protocol (IP) address, your login data, browser type, and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access this website
- iv. **Usage Data:** includes data such as information about how you use our website, products, and services.
- v. **Marketing and Communications Data:** includes data such as regarding your preferences in receiving marketing from us and our third parties and your communication preferences.

The website can be visited without revealing any personal information. However, when registering your details on the website to enable us better to assist you as appropriate, you may be asked to enter personal contact information and/or your company contact information such as your name,



email address, mailing address, phone number, or other details to help you with your experience. Where required BUA Foods will use this information to reply to your inquiries, provide you with requested services, and contact you regarding new services.

We may also collect information about your computer system, including where available your IP address, for system administration and to report aggregate information to our webmasters. This is statistical data about our users' browsing actions and patterns which does not identify any individual and allows us to ensure that content from our site is presented most effectively for you and your computer.

Why do We Collect Data?

We collect data to enable us to process requests or applications which you make, or which are made on your behalf with your consent and to provide you with our services.

We collect data to be able to communicate with you, provide further information on our products and services, and assist you.

We collect data to be able to respond to questions or requests which you submit as well as anticipate and resolve problems with any services we offer to you.

How Do We Collect Your Information?

We use different methods to collect data from and about you including through:

- **Direct interactions** - We collect your data through the direct provision of data in the course of your use of our services with your consent. You may give us your data by filling in forms or by corresponding with us by post, phone, email, or otherwise.
- **Automated Technologies or Activity interactions** - We collect your data through the direct provision of data in the course of your use of our services with your consent. As you interact with our website, we will automatically collect Technical Data about your equipment, browsing actions, and patterns. We collect this Personal Data by using cookies and other similar technologies.
- **Third parties or publicly available sources** - We may also receive your data from third parties to whom you have legally provided such data, and we may use such data in accordance with our policies. To the extent that such data is disclosed by third parties, whether service providers, advertisers, or other sites throughout the Internet, different rules may apply to their use or disclosure of your information. We do not control how they use or share your data and we cannot make any representations or warranties as to these.

We have exclusive ownership of the information collected on our website. We however only have this right over data that you have voluntarily shared with us directly or through your usage of our website.

Use of Information

With your consent, we use your information to fulfil requests to receive information or materials from us, to carry out services for your benefit, and to process applications and requests from you.

We do not use your data for any other purpose than for the purposes listed in this policy and we do not sell, lend or rent any Personal Data about you to any third parties.



In reviewing enquiries and applications, BUA Foods may need to disclose customers' Personal Data to BUA Foods' internal teams, consultants, and/or others (as it deems reasonably necessary).

Data Security

We have well-maintained systems for storing and managing your data, and we commit to conscientiously utilising your data in consonance with the provisions of this policy. We have suitable security measures in place to prevent your Personal Data from being accidentally lost or used or accessed in an unauthorised way by a third party. In addition, we limit access to your Personal Data to those employees, agents, contractors, and other third parties who have a business need to know. They will only process your Personal Data on our instructions and are subject to a duty of confidentiality.

To ensure the secure transmission of your Personal Data, our website employs Secure Sockets Layer/Transport Layer Security (SSL/TLS), this is evident in the padlock symbol in your URL address bar once you are successfully logged into the platform. The URL address will also begin with HTTPS://, the "s" indicating that the page is secure. SSL encrypts communication between two points, such as your computer and the connecting server. Any data sent during the session will be encrypted before being sent and decrypted at the receiving end. This is done to ensure that data cannot be read during transmission.

Our website is scanned regularly for security holes and known vulnerabilities to make your visit to our site as safe as possible. The information which you provide to us will ordinarily be stored on our secure servers. By submitting personal information, you agree to this transfer, storing, and processing. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Policy.

We have put in place procedures to deal with any suspected Personal Data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

We admit however that no website or database is completely secure or "hacker proof" and we only guarantee the safety of your data to the extent of our undertaking all reasonable measures to protect the data.

Sharing/Third-Party Disclosure

We do not sell, trade, or otherwise transfer to outside parties your Personal Data unless we provide users with advance notice. This does not include website hosting partners and other parties who assist us in operating our website, conducting our business, or serving our users, so long as those parties agree to keep this information confidential. We may also release information when its release is appropriate to comply with the law, enforce our site policies, or protect our rights or the rights of customers.

Your Rights

You have rights under data protection laws in relation to your Personal Data. It is BUA Foods' policy to respect your rights and BUA Foods will act promptly and in accordance with any applicable law, rule, or regulation relating to the processing of your Personal Data.

Details of your rights are set out below:



- **Right to be informed about how Personal Data is used** – you have a right to be informed about how we will use and share your Personal Data. This explanation will be provided to you in a concise, transparent, intelligible, and easily accessible format and will be written in clear and plain language;
- **Right to access Personal Data** – you have a right to obtain confirmation of whether we are processing your Personal Data, access to your Personal Data, and information regarding how your Personal Data is being used by us;
- **Right to have inaccurate Personal Data rectified** – you have a right to have any inaccurate or incomplete Personal Data rectified. If we have disclosed the relevant Personal Data to any third parties, we will take reasonable steps to inform those third parties of the rectification where possible;
- **Right to have Personal Data erased in certain circumstances** – you have a right to request that certain Personal Data held by us is erased. This is not a blanket right to require all Personal Data to be deleted. We will consider each request carefully in accordance with the requirements of any laws relating to the processing of your Personal Data;
- **Right to restrict processing of Personal Data in certain circumstances** – you have a right to block the processing of your Personal Data in certain circumstances. This right arises if you are disputing the accuracy of Personal Data if you have raised an objection to processing, if the processing of Personal Data is unlawful and you oppose erasure and request restriction instead or if the Personal Data is no longer required by us, but you require the Personal Data to be retained to establish, exercise or defend a legal claim;
- **Right to data portability** – in certain circumstances you can request to receive a copy of your Personal Data in a commonly used electronic format. This right only applies to Personal Data that you have provided to us (for example by completing a form or providing information through a website). Information about you that has been gathered by monitoring your behaviour will also be subject to the right to data portability. The right to data portability only applies if the processing is based on your consent or if the Personal Data must be processed for the performance of a contract and the processing is carried out by automated means (i.e., electronically);
- **Right to object to the processing of Personal Data in certain circumstances, including where Personal Data is used for marketing purposes** – you have a right to object to processing being carried out by us. You will be informed that you have a right to object at the point of data collection and the right to object will be explicitly brought to your attention and be presented clearly and separately from any other information.

You may exercise any of your rights by contacting our Data Protection Officer at info@buafoodsplc.com. You will not have to pay a fee to access your Personal Data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is unfounded, repetitive, or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

We may need to request specific information from you to help us confirm your identity and ensure your right to access your Personal Data (or to exercise any of your other rights). This is a security measure to ensure that Personal Data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.



We try to respond to all legitimate requests within one calendar month. Occasionally it may take us longer than one calendar month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

Visiting BUA Foods' Online Platforms from Outside Nigeria

BUA Foods is located in Nigeria. The services described on our website and other online platforms are directed only at customers in Nigeria. If you are visiting these platforms, or any part thereof, from outside of Nigeria, please be aware that your information may be transferred to, stored, or processed in Nigeria and maintained on computers or servers located outside of your country, or other governmental jurisdiction where the privacy laws may not be as protective as those in your jurisdiction. By using any portion of our platforms, you understand and consent to the transfer of your information to Nigeria and any third parties with whom we share it as described in this Privacy Policy.

Data Retention and Erasure

We will only retain your Personal Data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting, or reporting requirements. We may retain your Personal Data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation with respect to our relationship with you.

To determine the appropriate retention period for Personal Data, we consider the amount, nature, and sensitivity of the Personal Data, the potential risk of harm from unauthorised use or disclosure of your Personal Data, the purposes for which we process your Personal Data, and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.

By accessing this website and any of its pages you are agreeing to the terms set out above. You may also request to have all your personal information deleted entirely. Please note that if you request the erasure of your personal information. We may retain and use your personal information to the extent necessary to comply with our legal obligations, including but not limited to tax, legal reporting, and auditing obligations.

If you would like to know more about the retention periods we apply to your Personal Data, please contact us at info@buafoodsplc.com.

Remedies

In the event of any violation of this Privacy Policy by BUA Foods, the user shall be entitled to demand the return of all Personal Data collected and to demand the end of use of any such Personal Data. This remedy shall be available from the time of breach of this Privacy Policy, provided the user has already sent a complaint that was not attended to.



Changes to this Privacy Policy

BUA Foods reserves the right to modify this Privacy Policy at any time in accordance with this provision. If we make changes to this Privacy Policy, we will post the revised Privacy Policy on BUA Foods' website.

Contact Us

If you have any questions or complaints about this Privacy Policy or BUA Foods' information handling practices, you may contact us via mail at: info@buafoodsplc.com.