



EMPLOYEE DATA PRIVACY POLICY OF BUA CEMENT PLC

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1. INTRODUCTION

BUA Cement PLC (“BUA” or “Us” or “We”) needs to gather and use certain personal data in fulfilling its obligations to you. We respect the trust you repose in us in providing us with your data and we are completely committed to preserving, protecting, and safeguarding your rights in accordance with the applicable principles of data privacy.

This Employee Privacy Policy (“Privacy Policy” or “Policy”) is made pursuant to the Nigeria Data Protection Regulation (NDPR) issued by the National Information Technology Development Agency (NITDA) on the 25th of January 2019 which we adhere to as a corporate body.

This Privacy Policy outlines the information we collect from you, why we collect such data, how we use the data, how you can control the data and how we manage, store, protect, share, retain or delete your data.

2. PURPOSE AND OBJECTIVES

The main purpose of the Policy is to establish the essential standards put in place by BUA Cement to ensure data collected from members of staff and employees are used or processed in line with applicable regulations and to provide guidance on the standards of conduct and practice the company follows in protecting such data.

3. DEFINITIONS AND INTERPRETATION

The purpose of this policy:

- i. **‘BUA Cement’** means BUA Cement PLC.
- ii. **‘Data Protection’** means the process of safeguarding information from loss, corruption, or compromise.
- iii. **‘Nigeria Data Protection Regulation’ or ‘NDPR’** means a set of regulations introduced by NITDA regulators to enable Nigerian citizens and residents of Nigeria have more control over their data.
- iv. **‘National Information Technology Development Agency’ or ‘NITDA’** refers to the national agency charged with developing national regulations for electronic governance, electronic data interchange, electronic communication transactions, data protection and data privacy in Nigeria.
- v. **‘Personal Data’** means any information that can enable an individual to be identified.
- vi. **‘Processing’** means obtaining, recording, holding, or adding to the information or data or performing any operation on the information or data.
- vii. **‘Consent’** means giving permission for something to happen or an agreement to do something.

4. APPLICATION

This Policy applies to all employees of, and persons working for BUA Cement including former employees or employees in current employment, contractors, agency staff (collectively referred to as “**Employees**”).

5. WHAT IS PERSONAL DATA?

Personal Data means any information in any form that pertains to an individual which can be used to identify such an individual. Personal Data does not include publicly available information, anonymous or non-personal data.

6. WHAT PERSONAL DATA DO WE COLLECT?

We collect and maintain different types of Personal Data concerning Employees. This includes Personal Data contained in:

- Resumes/curriculum vitae and/or applications.
- References, guarantor's form, and interview notes.
- Photographs and video.
- Letters of offer and acceptance of employment.
- Policy acknowledgment sign-off or consent sheets.
- Payroll information, including financial information.
- Salaries and benefits information.
- Medical information and forms relating to the application for, or in respect of changes to, employee health and welfare benefits.
- Beneficiary and emergency contact information.
- Background screening information; and
- Medical test results.

In addition to the examples listed above, BUA Cement processes Personal Data from other sources which may include information such as name, home address, telephone, personal email address, date of birth, employee identification number, marital status, and any other information necessary to BUA Cement's business purposes, which is voluntarily disclosed in the course of an employee's application for and employment with BUA Cement.

As a general rule, BUA Cement collects Personal Data directly from you. In most circumstances where the Personal Data that we collect about you is held by a third party, we will obtain your permission before we seek out this information from such sources (such permission may be given directly by you, or implied from your actions).

From time to time, we may utilize the services of third parties and may also receive Personal Data collected by those third parties in the course of the performance of their services for us or otherwise. Where this is the case, we will take reasonable steps to ensure that such third parties have the right to disclose your Personal Data to us.

Where permitted or required by applicable law or regulatory requirements, we may collect information about you without your knowledge or consent.

7. USAGE OF PERSONAL DATA

We use your personal data for our business purposes, including establishing, managing or terminating your employment relationship with BUA Cement. Such uses may include:

- determining eligibility for initial employment, including the verification of references, guarantors, and qualifications;
- administering salary and benefits;
- processing employee work-related claims (e.g. worker compensation, insurance claims, etc.)
- establishing training and/or development requirements;
- conducting performance reviews and determining performance requirements;
- assessing qualifications for a particular job or task;
- gathering evidence for disciplinary action, or termination;
- establishing a contact point in the event of an emergency (such as next of kin);
- complying with applicable labour or employment statutes;
- compiling directories;
- ensuring the security of company-held information;
- such other purposes as are reasonably required by BUA Cement in connection with your employment; and
- for any additional purposes that we advise you of and for which we have a legal basis, which may for instance seek your consent when such consent is required by law.

8. DATA MINIMISATION

BUA Cement would only collect such personal data which it directly requires for carrying out its business, fulfilling its obligations or for any other purpose noted in this Privacy Policy.

You are at liberty to request information about any data requested of you to ensure that it is limited to what is required.

9. MONITORING

The work output of BUA Cement's employees, whether in paper record, computer files, or in any other storage format belongs to us, and that work output, and the tools used to generate that work output, are always subject to review and monitoring by BUA Cement.

In the course of conducting our business, we may monitor employee activities and our premises and property. For example, some of our locations are equipped with surveillance cameras. These cameras may generally be in high-risk areas. Where in use, surveillance cameras are there for the protection of employees and third parties, and to protect against theft, vandalism and damage to BUA Cement's goods and property.

Generally, recorded images are routinely destroyed and not shared with third parties unless there is suspicion of a crime, in which case they may be turned over to the police or other appropriate government agency or authority. We also have cause to monitor all employees' computer and e-mail use.

This section is to bring to your attention the fact that such monitoring may occur and may result in the collection of Personal Data from employees (e.g. through their use of our resources). When using BUA Cement equipment or resources, employees do not have any expectation of privacy with respect to their use of such equipment or resources.

10. DATA SHARING

Due to the nature of BUA Cement's operations, the company may disclose personal data with its parent company and other affiliates companies in order to fully perform its contract with you. BUA Cement is responsible for the management of your data during such data transfers and shall ensure that maximum security is ensured for the safety of your data.

We may share your Personal Data with other employees and members of staff within the company. Sensitive information will however be limited to those who have a need to know the information and this may include your managers and their designees, personnel in HR, IT, Legal, Finance, Accounting, and Internal Audit.

We may also share your Personal Data with third parties such as contractors, consultants and other parties who require such data to assist us with establishing, managing or terminating our employment relationship with you, or for the purpose of carrying on our business. When we share Personal Data with such third parties, we require that they only use or disclose such data in a manner consistent with the use and disclosure provisions of this Privacy Policy.

We may share Personal Data with such parties in and/or outside Nigeria, and as result, your personal data may be collected, used, processed, stored or disclosed in other countries. We only transfer data to an entity in another country where permitted under the Nigeria Data Protection Regulation and only to countries with an adequate level of data protection. Where we are required to share your data with a country not listed by NITDA as having adequate levels of protection for personal, we will only do so with your consent.

We do not sell your personal data to third parties.

11. NOTIFICATION AND CONSENT

Generally, Nigerian Privacy laws do not require BUA Cement to obtain your consent for the collection, use or disclosure of Personal Data for the purpose of establishing, managing or terminating your employment relationship, where such processing is directly connected to your employment contract with the company.

Where we process your personal data in any manner not directly connected to your employment and to the extent that your consent is required, we will take your signature on this document to be evidence that you have consented to BUA Cement collecting, using and disclosing your Personal Data for the purposes stated above (including any other purposes stated or reasonably implied at the time such Personal Data was provided to us).

Where your consent was required for our collection, use or disclosure of your Personal Data, you may, at any time, subject to legal or contractual restrictions and reasonable notice, withdraw your consent. All communications with respect to such withdrawal or variation of consent should be in writing and addressed to the Data Protection Officer as indicated in Clause 18 of this Privacy Policy.

12. DATA SECURITY

BUA Cement endeavours to maintain physical, technical, and procedural safeguards that are appropriate to the sensitivity of Personal Data. These safeguards are designed to protect your Personal Data from loss and unauthorized access, copying, use, modification, or disclosure. Despite these safeguards, we understand that no system of data security is fully and absolutely secure and will inform you of a breach to your Personal Data as may be required by Law should any occur despite our best efforts.

All employees are responsible for ensuring personal data are kept securely and accessible only to those who need to use it. Appropriate security measures are to be taken to prevent accidental loss of, or damage to, personal data. This will mean the use of passwords or encryption for electronic documents and keeping papers under lock and key.

The transport of Personal Data of fellow employees in any format (laptop, hard copy, memory stick etc.) should be avoided as much as possible. This applies especially to special categories of data, large volumes of personal data, or information which could cause particular harm or distress if accessed by third parties. Only in exceptional circumstances should this information be transported outside of the office premises. employees who do so should always ensure that it is kept safe at all times.

Any loss/theft/breach of personal data coming to the knowledge of any member of staff must be immediately reported to the Data Protection Officer.

13. DATA PROTECTION BY DESIGN

BUA Cement may put measures in place to ensure that your data is protected by design and such measures may include technical and organizational measures, as well as operational systems and processes within ordinary business activities which safeguard privacy and data protection principles.

Where the company is collecting a new type of data or implementing a new system or process, it may consider building in a data protection posture into the framework for such new data or new process.

14. DATA RETENTION

Except as otherwise permitted or required by applicable law or regulatory requirements, BUA Cement endeavours to retain your Data only for as long as it believes is necessary to fulfil the purposes for which the Personal Data was collected (including, for the purpose of meeting any legal, accounting or other reporting requirements or obligations).

Data retention is also determined by taking into consideration the following:

- The duration of the employment relationship
- The necessary management of benefits, tax, and other administrative formalities
- Potential re-hire

- Legal requirements for keeping data
- Statute of limitations.

Tasks or actions attributed to you in documents or systems will be retained until the related information is no longer useful for the Company's operations.

We may, instead of destroying or erasing your Personal Data, make it anonymous such that it cannot be associated with or tracked back to you or archive it, so that it is no longer active but can still be restored if needed.

15. DATA ACCURACY

It is important that the information contained in our records is both accurate and current. If your Personal Data changes at any time, please keep us informed of such changes. You can do this by contacting the [Head of Human Resources](#) or by contacting the company's designated Data Protection Officer (DPO.)

16. ACCESS TO YOUR PERSONAL DATA AND DELETION OF YOUR PERSONAL DATA

BUA Cement recognizes that you can request access to your personal data or rectification/deletion of personal data that we hold about you. To make such a request, please contact the designated Data Protection Officer using the contact information provided in Clause 18 of this Privacy Policy. Please note that any such communication must be in writing. In your request, please make clear what specific Personal Data you would like to have accessed, rectified, or deleted.

When requesting such access, rectification, or deletion of your personal data, please note that we may request specific information from you to enable us to confirm and record your intention. If you require assistance in preparing your request, please contact the office of the designated Data Protection Officer.

Your right to access, rectify, or delete the Personal Data that we hold about you is not absolute. There are instances where applicable law or regulatory requirements allow or require us to refuse your request. In addition, the Personal Data may have been destroyed, erased, or made anonymous in accordance with our record retention obligations and practices.

If we cannot provide you with access to, or rectification or deletion of your Personal Data, we will endeavour to inform you of the reasons why, subject to any legal or regulatory restrictions. We will not persecute you in any way for exercising any of your rights described under this heading.

Your legal rights:

In addition to being able to control the data you directly provide to us, you may exercise any of the below rights with respect to your data:

1. Request information about any of your personal data which we are processing, and request access to your personal information which we process.

2. Request correction of personal information that we hold about you to make it more accurate or to reflect changes in circumstances.
3. Request us to refrain from doing certain things with your data or restrict the extent of our collection or processing of your data.
4. Request partial or complete erasure of your personal information.
5. Object to our processing of your personal information where we are processing your personal information for direct marketing purposes.
6. Object to decisions being taken by automated means which produce legal effects concerning you or similarly significantly affect you.
7. Request the transfer of your personal information to another party. If you wish to exercise any of the rights set out above, please contact us **using the contact details provided** in #18.

17. INQUIRIES OR CONCERNS?

If you have any questions about this Privacy Policy or concerns about how we manage your Personal Data, or you intend to exercise your privacy rights, please contact the office of our Data protection officer by telephone, in writing or by e-mail. We will endeavour to answer your questions and advise you of any steps taken to address the issues raised by you.

18. DATA PROTECTION OFFICER

BUA Cement has a designated Data Protection Officer who is charged with overseeing compliance with this Privacy Policy. The contact information of our Data protection officer is as follows: Gregory.akpiche@buacement.com

19. UPDATES TO THIS PRIVACY POLICY

BUA Cement may from time to time make changes to this Privacy Policy to reflect changes in its legal or regulatory obligations or in the way we deal with your Personal Data. We will communicate any revised version of this Privacy Policy.

CONSENT STATEMENT

I, _____, having read and understood this privacy policy, consent to the terms contained in this policy.

Signed: _____

Dated: _____