




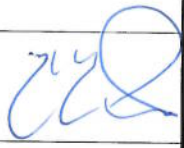

Seplat Petroleum Development Company



Security Classification: **Restricted**

SEP-CHR-GEN-W01- 018

DATA PROTECTION POLICY

MAY 2018

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ADDITIONAL APPROVAL / REVISION HISTORY TABLE

Party	Name	Sign	Date

Revision Philosophy

All draft documents for review will be issued at R01, with subsequent R02, R03, etc as required.

All revisions approved for issue / implementation will be issued at A01, with subsequent A02, A03, etc as required.

All revisions approved for design will be issued at D01, with subsequent D02, D03, etc as required.

Documents approved for Construction will be issued at C01, C02, and C03 respectively.

Documents or drawings revised as "As built" will be issued as Z01, Z02 Z03 etc.

Narrative sections revised from previous approved issues are to be noted in the table below and/or highlighted in the RH margin (using the appropriate revision status) thus: | A02

Previous revision highlighting to be removed at subsequent issues.

Drawings/diagrams revised from previous approved issues are highlighted by 'clouding' the affected areas and by the use of a triangle containing the revision status.

Revision History		
Revision No.	Date of issue	Reason for change





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1.0 INTERNAL DATA PROTECTION POLICY

1.1 Introduction

This Internal Data Protection Policy (this **Policy**) is provided by Seplat Petroleum Development Company Plc. (**Seplat** or the **Company**), on behalf of itself, its subsidiaries and its affiliates, and is addressed to the Company's current, former and prospective directors, officers, consultants, employees, temporary staff, individual contractors, interns, secondees and other personnel (the **Individual** or **Service User**).



For purposes of this Policy, the Data Controller is Seplat.

1.2 Objective

The Company needs to collect (and use) certain types of information about the Individuals or Service Users who come into contact with the Company in order to carry out its operations. This information must be collected and dealt with appropriately whether it is collected on paper, stored in a computer database, or recorded on other material, and there are safeguards to ensure this under applicable Nigerian laws.

1.3 Definitions

- **"Adequate Jurisdiction"** means a jurisdiction that has been formally designated by the European Commission as providing an adequate level of protection for Personal Data.
- **"Controller"** means the entity that decides how and why Personal Data are processed. In many jurisdictions, the Controller has primary responsibility for complying with applicable data protection laws.
- **"Data Protection Authority"** means an independent public authority that is legally tasked with overseeing compliance with applicable data protection laws.
- **"EEA"** means the European Economic Area.
- **"Individual/Service User"** – The person(s) whose personal information is being held or processed by Seplat for example, a client, an employee, supporter, temporary staff, individual contractors, interns, secondees or other personnel.
- **"Personal Data"** means information that is about any individual, or from which any individual is directly or indirectly identifiable, in particular by reference to an identifier such as a name, an identification number, location data, an online

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identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that individual.

- **“Process”, “Processing” or “Processed”** means anything that is done with any Personal Data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.
- **“Processor”** means any person or entity that Processes Personal Data on behalf of the Controller (other than employees of the Controller).
- **“Profiling”** means any form of automated Processing of Personal Data consisting of the use of Personal Data to evaluate certain personal aspects relating to a natural person, in particular to analyse or predict aspects concerning that natural person's performance at work, economic situation, health, personal preferences, interests, reliability, behaviour, location or movements.
- **“Relevant Personal Data”** means Personal Data in respect of which we are the Controller.
- **“Sensitive Personal Data”** means Personal Data about race or ethnicity, political opinions, religious or philosophical beliefs, trade union membership, physical or mental health, sexual life, any actual or alleged criminal offences or penalties, national identification number, or any other information that are deemed to be sensitive under applicable law.
- **“Standard Contractual Clauses”** means template transfer clauses adopted by the European Commission or adopted by a Data Protection Authority and approved by the European Commission.

2.0 COLLECTION OF PERSONAL DATA

Seplat may collect Personal Data on an Individual or Service User from the following sources:

- In the ordinary course of the Individual or Service User's work relationship with Seplat, or work for Seplat (e.g., during on-boarding for new members; or during processes for payroll purposes; and/or when the Individual or Service User uses Seplat's Information Technology (IT) systems;
- Personal Data manifestly made available by the Individual or Service User including via social media (to the extent that the Individual or Service User has made such Personal Data publicly visible); and

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- From third parties such as past employers, referees, and law enforcement agencies.

When collecting data, Seplat shall ensure that the Individual or Service User:

- clearly understands why the information is needed;
- understands what it will be used for and what the consequences are should the Individual/Service User decide not to give consent to processing; and
- as far as reasonably possible, grant explicit consent, either written or verbal for such data to be processed (this legal basis is only used in relation to processing that is entirely voluntary – it is not used for processing that is necessary or obligatory in any way).



3.0 CREATION OF PERSONAL DATA

Seplat may also create Personal Data about an Individual or Service User such as job title, compensation details and performance reviews. This Data helps the Company to conduct its operations and manage its workforce. If an Individual or Service User does not provide certain Personal Data, Seplat may not be able to achieve some of the aims outlined in this Policy.

4.0 CATEGORIES OF PERSONAL DATA SEPLAT PROCESS

The categories of Personal Data processed by Seplat are:

- **Personal details:** given name(s); preferred name; gender; date of birth / age; nationality; photograph; marital status; job title; employer entity; department; payroll system ID; salary and compensation details; Personnel ID type and number; passport number (where applicable); visa number (where applicable); work authorization number (where applicable); and details of dependents and family members.
- **Contact details:** home address; work address; home telephone number; work telephone number; work mobile telephone number; personal mobile telephone number; personal email address; work email address; network ID; and emergency contact details.
- **Internal communication records:** information concerning the use of, and Personal Data transmitted through, internal IT systems (e.g., emails, telephone records); and work-related social media profiles.
- **Compensation details:** salary and benefits; hourly rate (where applicable); target commission; bonus type; stock awards; eligibility for bonus and/or long-term

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income; pension details; bank account information; tax code and number; and expenses information.

- **Employment records:** employment percentage (full or part-time); original hire date; most recent hire date; probation end date; Personnel group/subgroup; supervisor name; organizational unit name; job level; working hours; work absence and attendance records; Personnel promotions; and vacations and vacation requests.
- **Personnel training and evaluation:** Personnel learning objectives; progress and results; Personnel development plan; Personnel performance objectives and appraisal results; Personnel self-assessment results; training undertaken and completed; and dates of training, qualifications obtained, academic degrees.
- **Compliance and disciplinary records:** reports of violations of internal policies and codes of conduct; disciplinary sanctions; manager's name and reporting structure; acknowledgments regarding internal policies; and date and reason for resignation or termination.
- **Background checks:** details revealed by background checks conducted in accordance with applicable law and subject to the Individual or Service User's prior express written consent, including details of past employment, details of residence, credit reference information, and criminal records checks.
- **Security data:** login details (including username and password); login records (including login location, login IP address, and failed login attempts); historic username and password details; CCTV records; internal investigations records; records of the Individual or Service User use of the Company's IT systems; and evidence relating to any actual or suspected breach of any Seplat policy, or applicable law.

5.0 SENSITIVE PERSONAL DATA

Seplat will not seek to collect or otherwise Process Sensitive Personal Data of Individual or Service Users, except where:

- the Processing is required or permitted by applicable law (e.g., to comply with Seplat's diversity reporting obligations);
- the Processing is necessary for the purposes of exercising rights, or fulfilling obligations, under applicable employment laws, social security laws, or social protection laws;
- the Processing is necessary for the detection or prevention of crime;
- the Processing is necessary for the establishment, exercise or defence of legal rights;



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- v. the Processing is necessary to protect the vital interests of any individual; or
- vi. The Company has, in accordance with applicable laws, obtained the Individual's or Service User's prior explicit consent before Processing the Individual's or Service User's Sensitive Personal Data (as above, this legal basis is only used in relation to Processing that is entirely voluntary – it is not used for Processing that is necessary or obligatory in any way).



6.0 PURPOSES OF PROCESSING AND LEGAL BASIS FOR PROCESSING

The purposes for which Seplat Processes Personal Data, subject to applicable laws, and the legal basis on which Seplat performs such Processing, are as follows:



Processing activity	Legal basis for Processing
<ul style="list-style-type: none"> • Recruitment: recruitment operations; advertising opportunities; internal promotions; changes of role; record-keeping; and performing background checks. 	<ul style="list-style-type: none"> • The Processing is necessary for compliance with a legal obligation; or • The Processing is necessary in connection with the Individual or Service User's contract of employment or engagement, or to take steps prior to entering into such a contract; or • Seplat has a legitimate interest in carrying out the Processing for the purpose of recruitment (to the extent that such legitimate interest is not overridden by the Individual or Service User's interests, fundamental rights, or freedoms); or • Seplat has obtained the Individual or Service User's prior consent to the Processing (this legal basis is only used in relation to Processing that is entirely voluntary – it is not used for Processing that is necessary or obligatory in any way).

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Processing activity	Legal basis for Processing
<ul style="list-style-type: none"> • HR management: human resources management and other required management of Personnel throughout the course of the Personnel relationship; checking entitlement to work; recruitment, performance management, promotions and succession planning; internal communication and management of industrial relations; Personnel surveys; mobility management, including international assignment and Personnel travel administration; appraisal/review; accounting; Personnel development; attendance and absence management; administration of sick leave; administration of annual leave; promotions; transfers; secondments; and creating and maintaining one or more internal Personnel directories. 	<ul style="list-style-type: none"> • The Processing is necessary for compliance with a legal obligation; or • The Processing is necessary in connection with an Individual or Service User's contract of employment or engagement, or to take steps prior to entering into such a contract; or • Seplat has a legitimate interest in carrying out the Processing for the purpose of management of its HR functions (to the extent that such legitimate interest is not overridden by the Individual or Service User's interests, fundamental rights, or freedoms); or • Seplat has obtained the Individual or Service User's prior consent to the Processing (this legal basis is only used in relation to Processing that is entirely voluntary – it is not used for Processing that is necessary or obligatory in any way).
<ul style="list-style-type: none"> • Business management: management and operation of our business: management of business activities; arranging meetings; marketing; procurement; internal communications; external communications; and the sale, transfer or reorganisation of any portion of our business. 	<ul style="list-style-type: none"> • The Processing is necessary in connection with the Individual or Service User's contract of employment or engagement, or to take steps prior to entering into such a contract; or • Seplat has a legitimate interest in carrying out the Processing for the purpose of managing our business (to the extent that such legitimate interest is not overridden by the Individual or Service User's interests, fundamental rights, or freedoms).

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Processing activity	Legal basis for Processing
<ul style="list-style-type: none"> • <u>Training</u>: Personnel training and awareness; legally required training for compliance purposes; career development activities; and skills management. 	<ul style="list-style-type: none"> • The Processing is necessary for compliance with a legal obligation; or • The Processing is necessary in connection with the Individual or Service User's contract of employment or engagement, or to take steps prior to entering into such a contract; or • Seplat has a legitimate interest in carrying out the Processing for the purpose of training the Company's Personnel (to the extent that such legitimate interest is not overridden by the Individual or Service User's interests, fundamental rights, or freedoms).
<ul style="list-style-type: none"> • <u>Communications and IT operations</u>: management of internal communications; provision and maintenance of IT systems and office equipment; equipment allocation record-keeping; operation of IT security, firewalls and anti-virus software; IT security processes; and audits. 	<ul style="list-style-type: none"> • The Processing is necessary in connection with the Individual or Service User's contract of employment or engagement, or to take steps prior to entering into such a contract; or • Seplat has a legitimate interest in carrying out the Processing for the purpose of communicating with the Company's Personnel (to the extent that such legitimate interest is not overridden by the Individual or Service User's interests, fundamental rights, or freedoms).
<ul style="list-style-type: none"> • <u>Health and safety</u>: workplace health and safety management; health and safety assessments and record keeping; and compliance with related legal obligations. 	<ul style="list-style-type: none"> • The Processing is necessary for compliance with a legal obligation; or • Seplat has a legitimate interest in carrying out the Processing for the purpose of managing and maintaining its communications and IT systems (to the extent that such legitimate interest is not overridden by the Individual or Service User's interests, fundamental rights, or freedoms); or • The Processing is necessary to protect the vital interests of any individual.

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Processing activity	Legal basis for Processing
<ul style="list-style-type: none"> • <u>Compensation</u>: compensation planning and payments; administration of payroll, compensation, incentives programs, benefits and pensions; expense reimbursement; stock administration; and administration of bonuses. 	<ul style="list-style-type: none"> • The Processing is necessary in connection with an Individual or Service User's contract of employment or engagement, or to take steps prior to entering into such a contract; or • Seplat has a legitimate interest in carrying out the Processing for the purpose of managing payments, benefits and compensation for its Personnel (to the extent that such legitimate interest is not overridden by the Individual or Service User's interests, fundamental rights, or freedoms).
<ul style="list-style-type: none"> • <u>Management of systems and operations</u>: administration of our IT systems; economic, financial and administrative management; planning; and reporting. 	<ul style="list-style-type: none"> • Seplat has a legitimate interest in carrying out the Processing for the purpose of managing its systems and operations (to the extent that such legitimate interest is not overridden by the Individual or Service User's interests, fundamental rights, or freedoms).
<ul style="list-style-type: none"> • <u>Financial management</u>: sales; finance; corporate audit; and vendor management. 	<ul style="list-style-type: none"> • The Processing is necessary for compliance with a legal obligation; or • The Processing is necessary in connection with the Individual or Service User's contract of employment or engagement, or to take steps prior to entering into such a contract; or • Seplat has a legitimate interest in carrying out the Processing for the purpose of managing our finances (to the extent that such legitimate interest is not overridden by the Individual or Service User's interests, fundamental rights, or freedoms).
<ul style="list-style-type: none"> • <u>Future planning</u>: succession and organizational planning, including budgeting. 	<ul style="list-style-type: none"> • Seplat has a legitimate interest in carrying out the Processing for the purpose of planning and budgeting (to the extent that such legitimate interest is not overridden by the Individual or Service User's interests, fundamental rights, or freedoms).

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Processing activity	Legal basis for Processing
<ul style="list-style-type: none"> • <u>Compliance and disciplinary procedures</u>: compliance with internal policies, codes of conduct and legal/regulatory obligations; disciplinary and grievance investigations; conciliation procedures; disciplinary procedures; and governance and internal reporting. 	<ul style="list-style-type: none"> • The Processing is necessary for compliance with a legal obligation; or • The Processing is necessary in connection with the Individual or Service User's contract of employment or engagement, or to take steps prior to entering into such a contract; or • Seplat has a legitimate interest in carrying out the Processing for the purpose of ensuring compliance with applicable laws and policies (to the extent that such legitimate interest is not overridden by the Individual or Service User's interests, fundamental rights, or freedoms).
<ul style="list-style-type: none"> • <u>Personnel Monitoring</u>: in accordance with applicable laws, Seplat may monitor the use of its IT and communications systems (including personal devices connected to Seplat group) and the information they contain, including network traffic and usage data, for purposes that may include systems maintenance, security, compliance with legal requirements and implementation of internal policies and procedures, as described in further detail in [the IT Security Policy]. Personal Data collected through such monitoring activities may be analysed and otherwise Processed in accordance with this Policy. 	<ul style="list-style-type: none"> • The Processing is necessary for compliance with a legal obligation; or • The Processing is necessary in connection with the Individual or Service User's contract of employment or engagement, or to take steps prior to entering into such a contract; or • Seplat has a legitimate interest in carrying out the Processing for the purpose of monitoring its premises, networks and systems (to the extent that such legitimate interest is not overridden by the Individual or Service User's interests, fundamental rights, or freedoms).



7.0 DISCLOSURE OF PERSONAL DATA TO THIRD PARTIES

Seplat may disclose Personal Data to other Seplat group companies, for legitimate business purposes, in accordance with applicable law. In addition, the Company may

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disclose Personal Data to the following Legal, tax and regulatory authorities, upon request, or for the purposes of reporting any actual or suspected breach of applicable law or regulation:

- accountants, auditors, lawyers and other outside professional advisors to the Company or Seplat group, subject to binding contractual obligations of confidentiality;
 - third party Processors (such as providers of payroll, pension scheme, insurance, medical benefits, human resources services, IT systems and support, and other third parties engaged to assist us in carrying out business activities), located anywhere in the world;
 - any relevant party, law enforcement agency or court, to the extent necessary for the establishment, exercise or defence of legal rights;
 - any relevant party for the purposes of prevention, investigation, detection or prosecution of criminal offences or the execution of criminal penalties, including the safeguarding against and the prevention of threats to public security; and
 - any relevant third-party acquirer(s), in the event that Seplat sells or transfers all or any portion of the Company's business or assets (including in the event of a re-organization, dissolution or liquidation).
- 7.1 Where the Company engages a third-party Processor to Process Personal Data, the Processor will be subject to binding contractual obligations to: (i) only Process the Personal Data in accordance with the Company's prior written instructions; and (ii) use measures to protect the confidentiality and security of the Personal Data.
- 7.2 The affected Individual or Service User will be made aware in most circumstances of how and with whom his/her/it's information will be shared. However, there are circumstances where the law allows Seplat to disclose data (including sensitive data) without the data subject's consent. These are instances of:
- i. carrying out a legal duty or as authorised by the law;
 - ii. protecting vital interests of an Individual/Service User or other person;
 - iii. the Individual/Service User has already made the information public;
 - iv. conducting any legal proceedings, obtaining legal advice or defending any legal rights;
 - v. monitoring for equal opportunities purposes – i.e. race, disability or religion;
 - vi. providing a confidential service where the Individual/Service User's consent cannot be obtained or where it is reasonable to proceed without consent:

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e.g. where the Company wishes to avoid forcing stressed or ill Individuals/Service Users to provide consent signatures.

7.3 Seplat regards the lawful and correct treatment of Personal Information as very important to successful working, and to maintaining the confidence of its Personnel, and Seplat intends to ensure that Personal information is treated lawfully and correctly. To this end, Seplat will adhere to the following principles of Data Protection which require that Personnel information:

- i. shall be Processed fairly and lawfully and, in particular, shall not be Processed unless specific conditions are met;
- ii. shall be adequate, relevant and not excessive in relation to the purposes for which such information is required by the Company;
- iii. shall be accurate and, where necessary, kept up to date;
- iv. shall not be kept for longer than is necessary;
- v. shall be kept secure by the Data Controller who takes appropriate technical and other measures to prevent unauthorised or unlawful processing or accidental loss or destruction of, or damage to, personal information;
- vi. shall not be transferred to a country or territory outside the EEA unless that country or territory ensures an adequate level of protection for the rights and freedoms of Individuals/Service Users in relation to the processing of personal information.

7.4 Seplat shall, through appropriate management and strict application of criteria and controls:

- i. observe fully conditions regarding the fair collection and use of Personal Information;
- ii. meet its legal obligations to specify the purposes for which information is used;
- iii. collect and process appropriate information, and only to the extent that it is needed to fulfil its operational needs or to comply with any legal requirements;
- iv. ensure the quality of information used;
- v. ensure that the rights of people about whom Personal Information is held, can be fully exercised including the:
 - right to be informed that processing is being undertaken,
 - right of access to one's personal information;
 - right to prevent processing in certain circumstances; and

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- right to correct, rectify, block or erase information which is regarded as wrong information).
- vi. take appropriate technical and organisational security measures to safeguard personal information;
- vii. ensure that personal information is not transferred abroad without suitable safeguards;
- viii. treat people justly and fairly whatever their age, religion, disability, gender, sexual orientation or ethnicity when dealing with requests for information; and
- ix. set out clear procedures for responding to requests for information.

8.0 INTERNATIONAL TRANSFER OF PERSONAL DATA

8.1 Due to the international nature of Seplat's business, Seplat may need to transfer Personal Data to other entities within the Seplat group, and/or to third parties, in connection with the purposes set out in this Policy. For this reason, Seplat may transfer Personal Data to other countries that may have different laws and data protection compliance requirements to those that apply in the country in which the Individual or Service User is located. In particular, basic information about the Individual or Service User's role may be shared with other Seplat group companies, via Seplat's internal Personnel directories. Other Processing of Personal Data by Seplat is generally limited to Seplat's Personnel who have a legitimate business need to access Personal Data for one or more of the purposes set out in this Policy.

8.2 Where Seplat makes a transfer of an Individual's or Service User's Personal Data from the EEA to recipients located outside the EEA who are not in Adequate Jurisdictions, such is done on the basis of Standard Contractual Clauses, the Individual or Service User may request a copy of Seplat's Standard Contractual Clauses using the contact details provided below.



9.0 DATA SECURITY

Seplat has implemented appropriate technical and organizational security measures designed to protect Personal Data against accidental or unlawful destruction, loss, alteration, unauthorised disclosure, unauthorised access, and other unlawful or unauthorised forms of Processing, in accordance with applicable law.

10.0 DATA ACCURACY

Seplat takes every reasonable step to ensure that:

- i. Personal Data Processed by Seplat are accurate and, where necessary, kept up to date; and

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- ii. any of an Individual or Service User's Personnel Data Processed that are inaccurate (having regard to the purposes for which they are Processed) are erased or rectified without delay.

From time to time Seplat may ask an Individual or Service User to confirm the accuracy of his/her Personal Data.

11.0 Data Minimisation

Seplat shall take every reasonable step to ensure that Personal Data Processed by Seplat are limited to the Personal Data reasonably required in connection with the purposes set out in this Policy.

12.0 Data Retention

Seplat shall take every reasonable step to ensure that Individual or Service User Personal Data are only Processed for the minimum period necessary for the purposes set out in this Policy. The criteria for determining the duration for which Seplat will retain such Personal Data are as follows:



(1) Seplat will retain Personal Data in a form that permits identification only for as long as:

- i. Seplat maintains an ongoing relationship with Individual or Service User (e.g., for the duration of the period for which the Individual or Service User is employed or engaged by Seplat); or
- ii. The Individual or Service User's Personal Data are necessary in connection with the lawful purposes set out in this Policy, for which Seplat has a valid legal basis (e.g., where the Individual or Service User's data are included in a contract with one of Seplat's customers, and Seplat has a legitimate interest in Processing those data for the purposes of operating its business and fulfilling its obligations under that contract; or where Seplat have a legal obligation to retain the Personal Data),

And:

(2) the duration of:

- i. any applicable limitation period under applicable law (i.e., any period during which any person could bring a legal claim against Seplat in connection with an Individual or Service User's Personal Data, or to which such Personal Data may be relevant); and
 - ii. an additional two (2) months period following the end of such applicable limitation period (so that, if a person brings a claim at the end of the limitation period, Seplat is still afforded a reasonable
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amount of time in which to identify any Personal Data that are relevant to such claim),

And:

- (3) in addition, if any relevant legal claims are brought, Seplat may continue to Process such Personal Data for such additional periods as are necessary in connection with such claim.

During the periods noted in paragraphs (2)(2)i and (2)(2)ii above, Seplat will restrict Processing of Personal Data to storage of, and maintaining the security of, those data, except to the extent that those data need to be reviewed in connection with any legal claim, or any obligation under applicable law.



Once the periods in paragraphs (1), (2) and (3) above, each to the extent applicable, have concluded, Seplat will either:

- (i) permanently delete or destroy the affected Personal Data; or
- (ii) anonymize the affected Personal Data.

13.0 INDIVIDUAL AND SERVICE USER LEGAL RIGHTS

13.1 Subject to applicable law, Individuals or Service Users may have the following rights regarding the Processing of his/her/its Personal Data:

- a) the right not to provide Personal Data to Seplat (however, please note that Seplat will be unable to provide such Individual or Service User with the full benefit of his/her/its relationship with Seplat – e.g., Seplat might not be able to process the Individual or Service User 's payroll, benefits entitlements or fees without the necessary details);
- b) the right to request access to, or copies of, relevant Personal Data, together with information regarding the nature, processing and disclosure of those relevant Personal Data;
- c) the right to request rectification of any inaccuracies in relevant Personal Data;
- d) the right to request, on legitimate grounds:
 - erasure of Relevant Personal Data; or
 - restriction of Processing of Relevant Personal Data;
- e) the right to have certain relevant Personal Data transferred to another Controller, in a structured, commonly used and machine-readable format, to the extent applicable.

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13.2 Where Seplat Process an Individual or Service User's relevant Personal Data on the basis of his/her/its consent, the right to withdraw that consent (noting that such withdrawal does not affect the lawfulness of any Processing performed prior to the date on which the Company receives notice of such withdrawal, and does not prevent the Processing of the Individual or Service User's Personal Data in reliance upon any other available legal basis).

13.3 Subject to applicable law, an Individual or Service User may also have the following additional rights regarding the Processing of his/her/its Relevant Personal Data:

- a. the right to object, on grounds relating to the Individual or Service User's particular situation, to the Processing of the Relevant Personal Data by Seplat or on Seplat's behalf; and
- b. the right to object to the Processing of the Relevant Personal Data by Seplat or on Seplat's behalf for direct marketing purposes.



13.4 The above shall not affect Individual or Service User 's statutory rights.

13.5 To exercise one or more of these rights, or to ask a question about these rights or any other provision of this Policy, or about Seplat's processing of Personal Data, Individuals or Service Users may make use of the contact details provided in in this Policy. However, Individual or Service User are to note that:

- a) in some cases, it will be necessary to provide evidence of the Individual or Service User's identity before Seplat can give effect to these rights; and
- b) where the Individual or Service User's request requires the establishment of additional facts (e.g., a determination of whether any processing is non-compliant with applicable law) Seplat will investigate the Individual or Service User's request reasonably and promptly, before deciding on what action to take.

14.0 INDIVIDUAL AND SERVICE USER OBLIGATIONS

It is important that Individuals or Service Users are aware of their data protection compliance obligations, and that they fulfil those obligations. This means that Individual or Service User must adhere to Seplat's policies, standards and procedures regarding the Processing of Personal Data to which such Individuals or Service Users have access in the course of their duties. In particular, Individuals or Service Users must:

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- a) familiarise themselves with this Policy and the Data Processing Procedure of the Company
- b) abide by applicable law at all times when Processing Personal Data;
- c) not access or otherwise Process any Personal Data beyond the extent necessary for his/her/its work with Seplat; and
- d) keep all Data that the Individual or Service User Processes strictly confidential. This obligation of confidentiality continues after termination of the Individual or Service User' professional relationship with Seplat.

15.0 CONTACT DETAILS

Where an Individual or Service User has any comments, questions, or concerns about any of the information in this Policy or any other issues relating to the Processing of Personal Data by Seplat, please contact the HR department of the Company; and the following employees as required:

DATA IMPORTER

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Legal Counsel
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Phone: +234-1-12770400 ext. 1113

DATA EXPORTER

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