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1.0 Policy

OOPC has adopted this policy about the privacy of Personal Data (the Policy) in order to assist in establishing and maintaining an adequate level of Personal Data privacy in the processing of personal data such collecting, recording, organizing, structuring, storage, adaptation, alteration, retrieval, consultation, use, dissemination, disclosing and cross-border transfer of Personal Data including that relating to current, past and prospective OOPC Personnel, clients, suppliers, contractors and business associates of OOPC following the principles and tenets, as applicable, of Nigeria Data Protection Act, 2023 and Nigeria Data Protection regulations 2019.

2.0 Scope

This policy is applicable to OOPC's interested parties, including Personnel, clients, suppliers, contractors, Host communities and business associates of OOPC.

3.0 Data protection principles

OOPC is committed to processing data in accordance with its responsibilities under the Nigeria Data Protection Regulation (NDPR) and Data Protection Act.

- a. Processed lawfully, fairly and in a transparent manner in relation to individuals;
- b. Collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes; further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall not be considered to be incompatible with the initial purposes;
- c. Adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;
- d. Accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay;
- e. Kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed; personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes subject to implementation of the appropriate technical and organizational measures required by the General Data Protection Regulation in order to safeguard the rights and freedoms of individuals; and
- f. Processed in a manner that ensures appropriate security of the personal data, including protection against unauthorized or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organizational measures.

4.0 Receiving confidential or personal information

Where OOPC and/or its approved agent(s) receive personal or confidential information from a third party, it shall:

- keep personal information and data confidential and secure, and only disclose such information to that personnel who have a legitimate business reason to access such information and to the public authorities according to the applicable legislation,
- Establish additional security measures and/or disclosure restrictions at the transferring party's written request.

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5.0 Use of Personal data

We collect and process your personal data for a specific purpose and only process the personal data which is necessary and relevant to achieving that purpose.

In particular, we process personal data for the following purposes always in accordance with the nature of our collaboration as well as applicable legislation and regulations:

- Perform our contractual obligations towards you or to take pre-contractual steps at your request and/or consent;
- manage our suppliers and subcontractors;
- monitor activities at our facilities, including compliance with applicable policies as well as health and safety rules in place;
- manage our IT resources, including infrastructure management and business continuity;
- preserve the firm's economic interests;
- ensure compliance and reporting (such as complying with our policies and local legal requirements, tax and deductions, managing alleged cases of misconduct or fraud, conducting audits and defending litigation);
- archiving and record-keeping;
- billing and invoicing;
- Engagement with our host communities and other stakeholders
- Third party audit and assessment; and
- Any other purposes imposed by law and authorities.

6.0 How we use your personal data

OOPC will not process your personal data if we do not have a proper justification foreseen in the law for that purpose. Therefore, we will only process your personal data if we have a basis or "ground" under the law to do so, such as:

- Performance of a contract: this is when the processing of your personal data is necessary to perform our obligations under a contract;
- Legal obligation: this is when we are required to process your personal data to comply with a legal obligation, such as keeping records for tax purposes or providing information to a public body or law enforcement agency;
- Legitimate interests: we will process your personal data where it is in our legitimate interest, so long as it doesn't outweigh your interests and freedoms;
- Vital interests: the processing is necessary to protect the vital interests of the relevant individual or of another natural person;
- Public Interest: the processing is necessary for the performance of a task carried out in the public interest; or
- Your consent: in some cases, and in addition to your contract, we will ask you for specific permission to process some of your personal information, and we will only process your personal data in this way if you agree for us to do so. You may withdraw your consent at any time by contacting us at hr@okomunigeria.com

7.0 Who has access to your personal data and to whom are they transferred?

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OOPC do not share personal data with unaffiliated third parties, except as necessary for their legitimate professional and business needs, to carry out your requests, and/or as required or permitted by law or professional standards.

OOPC shall ensure that the external services providers that have access to or use confidential information are bound by contractual obligations and Third-Party Data Processing Agreement to maintain the confidentiality and security of the information. OOPC may further include a confidentiality clause in the General terms of Business and confidentiality or non-disclosure agreements may be signed at times with third parties, (i.e. external service providers that have access to confidential information).

8.0 Protection of your personal data

OOPC shall implement appropriate organizational and technical measures to provide a high level of privacy and security to your personal data against accidental or unlawful destruction or alteration, accidental loss, unauthorized disclosure or access and other illegal forms of processing.

OOPC incorporates the protection of personal data as an integral part of its business operations by design and by default, so as to protect the rights of data subjects, such as user management policy, distinct roles and responsibilities, backups, physical security measures, policy of destruction of personal data etc.

9.0. Your privacy rights

Your rights include the right of access to your data, the rectification, the erasure / right to be deleted, the restriction of processing of personal data, the objection to processing of personal data, the data portability, the right to withdraw consent at any time (where processing is based on consent) and the right to lodge a complaint with Nigerian National Information Technology Agency (NITDA).

10.0 Responsible

The Human Resource Manager is responsible for the implementation of this policy.

11.0 Record of approval

Task	Name/Signature	Job Title	Date
Approved by	Dr. Graham Hefer	Managing Director	