

## **PRIVACY POLICY FOR VIRTUAL MEETINGS**

PZ Cussons Nigeria Plc as a Data Controller hosting virtual meetings and other live events, hereby sets out its privacy policy for virtual meetings in full compliance with the provisions of the Nigeria Data Protection Regulation (NDPR) 2019 and in clear indication of our transparency and regulatory compliance.

### **PERSONAL DATA COLLECTED**

The personal data we collect from you (may) include:

- Your names, email address, telephone number, location (where applicable)
- Your image (as processed by the video conferencing apps) or at live events, your voice, views etc.

### **WHY WE NEED YOUR DATA**

We collect information through our live events, and email correspondences:

- for the purpose of registration and participation at our online and offline events
- to facilitate dissemination of information about and the Company's events
- to improve analytics and research etc.
- also for record keeping and accountability

*We also collect data in order to:*

- provide you with information about possible future live events of the Company
- gather feedback to improve our service delivery
- respond to any feedback you send to us
- monitor participation at our events

### **LEGAL BASIS FOR PROCESSING YOUR DATA**

The legal basis for processing your personal data is your consent and our legitimate interests of adding intellectual and material value to participants at our live events.

### **WHAT CONSTITUTES CONSENT**

#### **How do we obtain your consent?**

Your consent is given when you log onto the PZ Cussons site, or designated Microsoft Teams and YouTube Channels designated for our live events or when you provide us with your personal data to enable you participate at our live events or receive information from us.

If we ask for your personal information for a secondary reason, like marketing, we will either ask you directly for your express consent, or provide you with an opportunity to say no.

#### How do I withdraw my consent?

We deem your consent to be validly given when you have attained the legal age requirement of the laws of Nigeria. If after you opt-in, you change your mind, you may withdraw your consent for us to contact you, for the continued collection, use or disclosure of your information, at any time, by contacting our Data Protection Officer at [jacqueline.ezeokwelum@pzcussons.com](mailto:jacqueline.ezeokwelum@pzcussons.com)

**Please note that such withdrawal of consent shall not affect the lawfulness of processing based on consent obtained before its withdrawal.**

#### **WHAT WE DO WITH YOUR DATA**

The data we collect may be shared with our data protection team or Data Protection Officer. It may also be shared with our technology suppliers, for example our hosting providers.

We will not:

- sell or rent your data to third parties
- share your data with third parties for marketing purposes
- expose your data to unauthorized persons in our organization

We will share your data if we are required to do so by law - for example, by court order, or to prevent fraud or other crime.

#### **HOW LONG WE KEEP YOUR DATA**

We will only retain your personal data for as long as:

- it is needed for the purposes set out in this policy
- the law requires us to
- except you exercise your right to request deletion of personal data

#### **WHERE YOUR DATA IS PROCESSED AND STORED**

We design, build and run our systems to make sure that your data is as safe as possible at all stages, both while it is processed and when it is stored. All personal data are stored in our data cloud except those stored by the video conferencing and other apps we use.

## **HOW WE PROTECT YOUR DATA AND KEEP IT SECURE**

We are committed to doing all that we can to keep your data secure. We have set up systems and processes to prevent unauthorized access or disclosure of your data - for example, we protect your data using varying levels of encryption.

We also make sure that any third parties that we deal with keep all personal data they process on our behalf secure.

## **YOUR RIGHTS**

You have the following rights under the data protection legislations:

- information on how your personal data is processed
- a right of access to your personal data
- right to withdraw consent at anytime
- right to object to processing of your data
- right to rectification of your data
- right to request us to transfer your data to another entity electronically
- right to lodge a complaint to the supervisory authority (NITDA)

You can also:

- raise an objection about how your personal data is processed
- request that your personal data is erased if there is no longer a justification for it
- ask that the processing of your personal data is restricted in certain circumstances

If you have any of these requests, please contact our Data Protection Officer at [jacqueline.ezeokwelum@pzcussons.com](mailto:jacqueline.ezeokwelum@pzcussons.com)

## **REMEDIES**

We will address any complaint or any violation of your privacy rights in accordance with the NDPR 2019. You are also at liberty to file an action in court for redress.

## **TIME FRAME FOR REMEDIES**

This shall be determined by a court of competent jurisdiction or the regulator as the case may be.

## **LINKS TO OTHER WEBSITES**

This privacy notice for virtual meetings only applies to our activities and does not cover other third party links and services or transactions that we connect to. These services or sites such as Microsoft Teams and YouTube etc. have their own terms and conditions and privacy policies.

## **FOLLOWING A LINK TO ANOTHER WEBSITE**

If you proceed to another website from any of our links, we advise that you read the privacy policy on that website to find out what it does with your information.

## **GOVERNING PRINCIPLES OF OUR DATA PROCESSING**

In line with the NDPR 2019, we guarantee that your personal data shall be:

- collected and processed in accordance with specific, legitimate and lawful purpose consented to by you; provided that: a further processing may be done only for archiving, scientific research, historical research or statistical purposes for public interest;
- restricted to you and shall not be transferred to any person or entity except when required by law;
- adequate, accurate and without prejudice to the dignity of human person;
- stored only for the period within which it is reasonably needed, and
- secured against all foreseeable hazards and breaches such as theft, cyberattack, viral attack, dissemination, manipulations of any kind, damage by rain, fire or exposure to other natural elements.
- Not used for any automated decision making or profiling etc.

## **CONTACT US OR MAKE A COMPLAINT**

Please contact our Data Protection Officer (DPO) at [jacqueline.ezeokwelum@pzcussons.com](mailto:jacqueline.ezeokwelum@pzcussons.com) if you:

- wish to register a data compliance issue with us
- have a question about anything in this privacy notice
- think that your personal data has been misused or mishandled

The DPO provides independent advice and monitoring of our use of personal information.

You can also make a complaint to the National Information Technology Development Agency (NITDA) who is an independent regulator.

### **UPDATES TO THIS POLICY**

There may be revisions to this policy. In that case, the 'last updated' date at the bottom of this page will also change. Any changes to this privacy policy will apply to you and your data immediately.

If these changes affect how your personal data is processed, we will take reasonable steps to let you know.

**Published 24 July 2020**

A handwritten signature in blue ink, consisting of a long horizontal stroke at the top, followed by a series of loops and a final downward stroke.

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**MANAGEMENT**