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DATA PROTECTION POLICY

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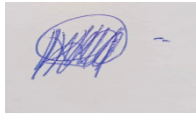
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1. Introduction

1. Purpose

In its everyday business operations Teasy International Company Limited makes use of a variety of data about identifiable individuals, including data about:

- Current, past and prospective employees
- Customers contact information

In collecting and using this data, the organisation is subject to a variety of legislation controlling how such activities may be carried out and the safeguards that must be put in place to protect it.

The purpose of this policy is to set out the relevant legislation and to describe the steps Teasy International Company Limited is taking to ensure that it complies with it.

0. Scope

This control applies to all systems, people and processes that constitute the organisation's information systems, including board members, directors, employees, suppliers and other third parties who have access to Teasy International Company Limited systems.

The following policies and procedures are relevant to this document:

- *Personal Data Analysis Procedure*
- *Records Retention and Protection Policy*

0. Definitions

There are a number of definitions listed within the GDPR and it is not appropriate to reproduce them all here. However, the most fundamental definitions with respect to this policy are as follows:

1. Personal data

Defined as "any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person".

0. Processing

"Any operation or set of operations which is performed on personal data or on sets of 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."

0. Controller

"The natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data;

0. Personal Identifiable Information (PII)

Information that can be used on its own or with other information to identify, contact, or locate a single person, or to identify an individual in a context.

0. Breach of Personal Data

A breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, Personal Data transmitted,

stored or otherwise processed.

0. Sensitive Personal Data

Data relating to religious or other beliefs, sexual orientation, health, race, ethnicity, political views, trades union membership, criminal records or any other sensitive personal information;

0. Third Party

Any natural or legal person, public authority, establishment or any other body other than the Data Subject, the Data Controller, the Data Administrator and the persons who are engaged by the Data Controller or the Data Administrator to process Personal Data.

0. Responsibilities

The DPO is responsible for all aspects of the implementation and management of this policy, unless noted otherwise.

IT Managers are responsible for the implementation of this policy, within the scope of their responsibilities, and must ensure that all staff under their control understand and undertake their responsibilities accordingly.

0. Policy

1. The Nigerian data protection regulation

The Nigerian Data Protection Regulation (NDPR) is one of the most significant pieces of legislation affecting the way that Nordomatic carries out its information processing activities. Significant fines are applicable if a breach is deemed to have occurred under the NDPR, which is designed to protect the personal data of citizens of Nigeria. It is Teasy International Company Limited's policy to ensure that our compliance with the NDPR and other relevant legislation is clear and demonstrable at all times.

0. Principles relating to processing of personal data

There are several fundamental principles upon which the NDPR is based. These are as set out in Article 5(1) of the GDPR as follows:

"Personal data shall be:

- a) Processed lawfully, fairly and in a transparent manner in relation to the data subject (**'lawfulness, fairness and transparency'**);
- 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, in accordance with Article 89(1), not be considered to be incompatible with the initial purposes (**'purpose limitation'**);
- c) Adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed (**'data minimisation'**);
- 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 (**'accuracy'**);

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 in accordance with Article 89(1) subject to implementation of the appropriate technical and organisational measures required by this Regulation in order to safeguard the rights and freedoms of the data subject (**'storage limitation'**);

f) Processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures (**'integrity and confidentiality'**)."

Paragraph 2 further states that "The controller shall be responsible for, and be able to demonstrate compliance with, paragraph 1 (**'accountability'**)."

Teasy International Company Limited will ensure that it complies with all these principles both in the processing it currently carries out and as part of the introduction of new methods of processing such as new IT systems.

0. Rights of the Individual

The data subject also has rights under the NDPR. These consist of:

1. The right to be informed
2. The right of access
3. The right to rectification
4. The right to erasure
5. The right to restrict processing
6. The right to data portability
7. The right to object
8. Rights in relation to automated decision making and profiling.

Each of these rights are supported by appropriate procedures within Nordomatic that allow the required action to be taken within the timescales stated in the NDPR.

These timescales are shown in Table 1.

DATA SUBJECT REQUEST	Plan/Process	Responsible	TIMESCALE
The right to be informed	Teasy International Company Limiteds DPO shall as required pass relevant information associated with Personal	Teasy International Company Limiteds DPO or	When data is collected (if supplied by data subject) or within one

	information of Data Subjects	Data controller (Bank)	month (if not supplied by data subject),
The right of access	Teasy International Company Limiteds DPO shall default data access request by Data subjects to access control policy of Data controller (Bank or Teasy International Company Limited ISMS Manager)	Teasy International Company Limiteds DPO or Data controller (Bank)	One month
The right to rectification	Teasy International Company Limiteds DPO shall default data rectification request by Data subjects to access control policy of Data controller (Bank or Teasy International Company Limited HR)	Teasy International Company Limiteds DPO or Data controller (Bank)	One month
The right to erasure	Teasy International Company Limiteds DPO shall default data erasure request by Data subjects to Data Protection policy of Data controller (Bank or Teasy International Company Limited DPO)	Teasy International Company Limiteds DPO or Data controller (Bank)	Without undue delay
The right to restrict processing		Teasy International Company Limiteds DPO or Data controller (Bank)	Without undue delay
The right to data portability		Teasy International Company Limiteds DPO or Data controller (Bank)	One month

The right to object		Teasy International Company Limiteds DPO or Data controller (Bank)	On receipt of objection
Rights in relation to automated decision making and profiling.		Teasy International Company Limiteds DPO or Data controller (Bank)	Not specified

Table 1: Timescales for data subject requests

0. How we Collect Your Personal Information

When you use Teasy International Company Limited Services, we collect information from our website, email, phone calls and digital forms. The automatically collected information includes but not limited to- data about the Teasy International Company Limited web pages you access, computer IP address, device ID or unique identifier, device type, geo-location information, computer and connection information, mobile network information.

We may also collect information you provide us including but not limited to- information on web form, survey responses, account update information, email, phone number, organisation you represent, social position, correspondence with Teasy International Company Limited support services. We may also collect information about your transactions, enquiries and your activities on our platform or premises. We may also use information provided by these parties like social media sites.

0. Lawfulness of processing

There are six alternative ways in which the lawfulness of a specific case of processing of personal data may be established under the GDPR. It is Teasy International Company Limited policy to identify the appropriate basis for processing and to document it, in accordance with the Regulation. The options are described in brief in the following sections.

1. Consent

Where appropriate, Teasy Mobile will obtain consent from a data subject to collect and process their data. Transparent information about our usage of their personal data will be provided to data subjects at the time that consent is obtained and their rights regarding their data explained, such as the right to withdraw consent. This information will be provided in an accessible form, written in clear language and free of charge.

If the personal data are not obtained directly from the data subject, then this information will be provided to the data subject within a reasonable period after the data are obtained and definitely within one month.

Teasy International Company Limited does not knowingly collect or process personal information of children below the age of 18.

0. Performance of a contract

Where the personal data collected and processed are required to fulfil a contract with the data subject, consent is not required. This will often be the case where the contract cannot be completed without the personal data in question, for example, a delivery cannot be made without an address.

0. Legal obligation

If the personal data are required to be collected and processed in order to comply with the law, then consent is not required. This may be the case for some data related to employment and taxation for example, and for many areas addressed by the public sector.

0. Vital interests of the data subject

In a case where the personal data are required to protect the vital interests of the data subject or of another natural person, then this may be used as the lawful basis of the processing. Teasy International Company Limited will retain reasonable, documented evidence that this is the case, whenever this reason is used as the lawful basis of the processing of personal data. As an example, this may be used in aspects of social care, particularly in the public sector.

0. Task carried out in the public interest

Where Teasy International Company Limited needs to perform a task that it believes is in the public interest or as part of an official duty then the data subject's consent will not be requested. The assessment of the public interest or official duty will be documented and made available as evidence where required.

0. Legitimate interests

If the processing of specific personal data is in the legitimate interests of Teasy International Company Limited and is judged not to affect the rights and freedoms of the data subject in a significant way, then this may be defined as the lawful reason for the processing. Again, the reasoning behind this view will be documented.

0. Privacy by design

Teasy International Company Limited has adopted the principle of privacy by design and will ensure that the definition and planning of all new or significantly changed systems that collect, or process personal data will be subject to due consideration of privacy issues, including the completion of one or more data protection impact assessments.

The data protection impact assessment will include:

- Consideration of how personal data will be processed and for what purposes
- Assessment of whether the proposed processing of personal data is both necessary and proportionate to the purpose(s)
- Assessment of the risks to individuals in processing the personal data
- What controls are necessary to address the identified risks and demonstrate compliance with legislation

Use of techniques such as data minimization and pseudonymisation will be considered where applicable and appropriate.

0. Contracts involving the processing of personal data

Teasy International Company Limited will ensure that all relationships it enters that involve the processing of personal data are subject to a documented contract that includes the specific information and terms required by the GDPR.

0. Personal data transfer

1. Intrnational Transfer of personal data

Teasy International Company Limited Shares Personal Data of Data Subjects Internally amongst other members of staff as needed for defined/agreed processing activities. Teasy International Company Limited will also share information with third parties such as Regulators, Government and security agencies in accordance with agreements. Transmission of personal data to recipients within or outside the organisation shall be subject to the requirements for processing personal data as described in Section 2.4 above. In the event that data is transmitted to a recipient outside the organisation, this recipient must agree to maintain a data protection level equivalent to this Policy. This does not apply if transmission is based on a legal obligation.

The transmission of personal data shall also be permitted if national legislation requires or authorises it. The type and extent of data processing must be necessary for the legally authorised data processing activity and must comply with the relevant statutory provisions. In certain circumstances, personal data shall be disclosed, based on a legal obligation, to law enforcement agencies, without the consent of the data subject.

0. International transfers of personal data

Teasy International Company Limited does not presently engage in the transfer of personal data outside Nigeria, However, where there is a need to do so, Teasy International Company Limited will carry out careful review prior to the transfer taking place to ensure that they fall within the limits imposed by the GDPR. This depends partly on the NITDA judgement as to the adequacy of the safeguards for personal data applicable in the receiving country and this may change over time.

Where an adequacy decision does not exist for a destination country, an appropriate safeguard such as standard contractual clauses will be used, or a relevant exception identified as permitted under the GDPR/GDPR.

0. Data Subject Access and Modification Requests

The organisation staff and external individuals have rights to request as listed in section 2.4 for access and modification of their personal data. Access requests from individuals should be addressed by email or in writing to the Data Protection Officer (DPO) of the organisation.

Once an access request is received by the organisation, it shall be duly verified before being handled. After the verifying the identity of the subject requesting access, only then will the organisation take steps to guide individual on how he may be granted access or make updates to the requested information in a timely manner, Any and all personal data updates discovered during Data Processing by Teasy International Company Limited shall be communicated to the respective Data Controllers (Banks) in a timely manner.

0. Data protection officer

Teasy International Company Limited has appointed a DPO, and has ensured that data subjects have the means to contact the organisation and the Data Protection Officer to verify their data hold within the organisation, and authorise the Organisation personnel to update and correct their personal information and/or exercise other rights captured under section 2.4 of this policy. Such an obligation entails the following:

- the staff of the organisation shall have access to their personal files and to any personal information held by the organisation on them via a Human Resource Information Management System. The consultation of Personal Data of employees by a staff other than Human Resource department staff is strictly prohibited.
- the organisation's customers, partners, contractors and suppliers can reach out to the Organization's data protection officer to check their data held by the organisation and make any permissible requests on them. Such enquiries shall be sent to Support@TeasyMobile Moneyng.com or via a written request.
- Information updates acquired during the processing of information for the Bank shall be communicated to the bank in a timely and secure manner.

0. Providing Information

The organisation aims to ensure that data subjects are aware that their data is being processed, and that they understand:

- How the data is being used;
- How to exercise their rights;

To these ends, this policy shall be shared with all staff and also made available on request by data subjects. Any user of an electronic service owned and/or operated by the organisation shall be similarly informed in a clear and comprehensive manner via a privacy policy available on the electronic service.

0. Data Confidentiality

Unauthorised collection, processing, or use of personal data by employees and any other representative or service provider to the Organisation is strictly prohibited. Personal Data shall be made available only on need-to-know basis and only authorised employees shall have access to this information as appropriate for the type and scope of the task in question.

Employees and these other entities are prohibited from using personal data for private or commercial purposes, to disclose it to unauthorised persons, or to make it available in any other way.

Supervisors shall remind their subordinates at the start of the employment relationship about the obligation to protect data secrecy as captured in their letters of employment,

and shall remain in force even after employment has ended.

0. Annual NDPR Audit

Teasy International Company Limited shall commission an external auditing firm of esteemed reputation to assess the organisation's compliance with this policy and other relevant data protection regulations Every year. The results of the data protection audit performed shall be reported to the Management of the organisation and shall be made available to the responsible data protection authority. The responsible data protection authority can perform its own audit of compliance with the regulations of this Policy, as permitted under Nigerian law.

0. Breach notification

It is Teasy International Company Limited policy to be fair and proportionate when considering the actions to be taken to inform affected parties regarding breaches of personal data. In line with the NDPR, where a breach is known to have occurred which is likely to result in a risk to the rights and freedoms of individuals, the relevant supervisory authority will be informed within 72 hours. This will be managed in accordance with our ***Information Security Incident Response Procedure*** which sets out the overall process of handling information security incidents.

Under the NDPR the relevant DPA has the authority to impose a range of fines of up to four percent of annual worldwide turnover or twenty million Naira for infringements of the regulations.

0. Addressing compliance to the NDPR

The following actions are undertaken to ensure that Teasy International Company Limited complies at all times with the accountability principle of the NDPR:

- The legal basis for processing personal data is clear and unambiguous
- A Data Protection Officer is appointed with specific responsibility for data protection in the organisation
- All staff involved in handling personal data understand their responsibilities for following good data protection practice
- Training in data protection has been provided to all staff
- Rules regarding consent are followed
- Routes are available to data subjects wishing to exercise their rights regarding personal data and such enquiries are handled effectively
- Regular reviews of procedures involving personal data are carried out
- Privacy by design is adopted for all new or changed systems and processes
- The following documentation of processing activities is recorded:
 - Organisation name and relevant details
 - Purposes of the personal data processing
 - Categories of individuals and personal data processed
 - Categories of personal data recipients
 - Agreements and mechanisms for transfers of personal data to non-EU countries including details of controls in place
 - Personal data retention schedules
 - Relevant technical and organisational controls in place

These actions are reviewed on a regular basis as part of the management process concerned with data protection.

0. Storage, Retention and Disposal

Teasy International Company Limited addressed storage, retention and disposal of Personal Information of Data subjects in accordance with ISO 27001 Requirements.

- Personal Data acquired from Data Controllers (Banks) or websites for the purpose of Data Processing shall be retained for a period of 6 months after which it shall be appropriately disposed of.
- All physical and Electronic Human Resource records shall be securely archived for future reference
-

0. Breaches of Policy

Teasy International Company Limited will take all necessary measures to remedy any breach of this policy including the use of our disciplinary or contractual processes where appropriate.

1. Investigation

The organisation shall conduct an investigation into the incident and during the course of the investigation depending on the gravity of the suspicion or accusations, suspend the staff or relationship with the alleged stakeholder.

0. Sanctions

If it comes to light that the accused associated with the organisation has deliberately violated the rules set in the policy for personal profit or any other usage of personal data, or has systematically and deliberately contravened with the principles and standards contained in this document, the organisation shall take immediate appropriate disciplinary actions which may include the following:

- Employees - disciplinary action/dismissal;
- Trustees, officers and interns - ending the relationship with the organisation;
- Partners - withdrawal of funding/support;
- Contractors and consultants - termination of contract.

Based on the nature of the violation, the organisation may consider involving government authorities such as police in the case.

0. Reporting

All staff and partners are professionally and legally obligated to Report suspected or actual violations to this policy. Failure to report such information can lead to disciplinary action. The organisation encourages its staff to report suspected violation cases which involve any staff, consultants, board members or guests of the organisation or partner organisations.

In the case of a breach involving Personal Data of data Subjects, Teasy International Company Limited shall respond to in accordance with the Data Breach Notification Procedure

0. Review

The Data Protection Policy shall be reviewed annually or as required.

0. Records

Records retained in support of this policy are controlled according to our Records Retention Policy.