

PROGRESS TRUST CPFA LIMITED

Privacy Policy

1. General

Progress Trust CPFA Limited, a subsidiary of Nigerian Breweries Plc, is located at No.1, Abebe Village Road, Iganmu, Lagos, Nigeria (“PTL” or “we” or “us”), and pursuant to its statutory mandate of administering the pension of contributors and retirees under the Contributory Pension Scheme (CPS) in Nigeria, PTL, a licensed Closed Pension Fund Administrator (CPFA), collects and keeps in custody, the personal data of pension contributors, retirees and their related persons, such as beneficiaries and next-of-kins and their employers. The data include, but are not limited to, the biometrics and biodata of contributors, retirees and related persons. PTL is also the controller of the processing of all personal data collected through this website dedicated to PTL (the “Website”). PTL respects your privacy and is committed to keeping your Personal Data secure and managing it in accordance with our legal responsibilities under applicable data protection laws.

Please read this Privacy Policy carefully as it contains important information to help you understand our practices regarding any personal information that you give to us or that we collect otherwise in the context of the Website (“Personal Data”).

2. What Personal Data We Collect and How We Use Your Personal Data

You can use the majority of our website without being required to provide any Personal Data to us. For certain services or activities you will need to provide Personal Data for us to be able to provide you the requested service or product or for you to participate in the activity. Requested information on the Website marked with an asterisk is mandatory. If you do not provide the requested information, we will not be able to deliver the service or product to you or you cannot participate in the activity. In addition to information you are required to provide to us in order to participate in activities/campaigns, we collect certain information in line with the Pension Reform Act 2014 such as data of pension contributors, retirees and their related persons. These may include name, gender, marital status, date of birth, nationality, National Identification Number, employment information and Next-of-Kin Information, amongst others.

In particular, PTL collects the personal data of a pension contributor in order to maintain the contributor’s pension balance and to administer to him/her the retirement benefits under the CPS. In this regard, it is necessary, to collect some basic personal data of contributors to ensure that uniquely identifiable persons are registered under the CPS and that their data are tied to their various employments. It also facilitates the accurate computation of and remittance of pension contributions and other entitlements to the contributors balance and the payment of benefits to them. Collection of data of the next-of-kins and beneficiaries of contributors, retirees and their related persons further ensures that PTL has continuous access to them.

- **information when you contact us;**

If you visit our Website and have a question or other remark, you can submit our Contact Form. You will be asked to provide your name and email address and obviously information about your request. We will only use this information to respond to your

question. We will register your requests, questions and our responses and other actions to handle your request. We will retain all information for 6 months after your question

or complaint has been solved or the inquiry was closed.

- **information about your visit to and use of our Website;**

We collect certain information when you visit our Website, such as your IP address, which web pages you visit, device category, browser, and type of internet browser, clicks and views. We use this Personal Data as it is necessary in our legitimate interests to do so to be able to promote our products and services to our clients and website visitors and to generally improve awareness on our services.

- **marketing;**

If you subscribe, we will send you newsletters. You can always opt-out of receiving our newsletter and you can always object to our use of your Personal Data for direct marketing purposes (for more information about how to do this, read the paragraphs below). We use this Personal Data with your consent. We will delete your Personal Data when you opt-out of receiving our newsletter.

- **maintenance and optimisation of our Website;**

Your Personal Data will also be used for maintenance and analysis of our Website to solve performance issues, to improve the availability and user experience. We log all use of our Website.

Our use of your Personal Data for these purposes is necessary in our legitimate interests and the information will be retained for as long as is necessary. We will delete any information you request us to as may be relevant. The logs of the use of our Website will reviewed annually and deleted as may be required.

3. How We Share Your Personal Data

We may need to share Personal Data with third parties to help us provide services and products to you and to run our Website. These third parties are:

- HEINEKEN group companies if another affiliate is best suited to answer a question you have posted on the Website
- HEINEKEN group companies for the purpose of storing Personal Data processed via the Website, due to shared IT systems
- service providers where this is needed to provide us with a service and to provide data analytics services
- media agencies for marketing purposes and research purposes
- in case PTL sells all or some of the assets or shares of a PTL group company to which Personal Data was transferred to a third party, your Personal Data may be provided to this third party.

These parties may be located in Nigeria or elsewhere in the world. When Personal Data is stored by us outside Nigeria we will ensure an adequate level of protection of the transferred Data. We require service providers to use appropriate measures to protect the confidentiality and security of the Personal Data.

We may also need to provide Personal Data to law enforcement bodies in order to comply with any legal obligation or court order.

4. Disclosure of Personal Data

Without prejudice to the foregoing provisions, however, the PFA may be obliged to disclose personal data in its custody on the following circumstances:

- a) Where disclosure is made in compliance with statutory obligation or pursuant to an order of a court of competent jurisdiction.
- b) Where the data owner has expressly consented to the disclosure or instructed that his/her data be fully or partially disclosed to a named person; Provided that such consent or instruction may be withdrawn and communicated to the PTL in writing at any time before disclosure.
- c) Where the disclosure is made to the owner of the data for his/her personal use or record.

5. Security of Personal Data

We will take appropriate technical, physical and organizational measures to protect the Personal Data collected through the Website from misuse or accidental, unlawful or unauthorized destruction, loss, alteration, disclosure, acquisition or access, that are consistent with applicable privacy and data security laws and regulations. However, no internet-based site can be 100% secure and we cannot be held responsible for un-authorized or unintended access that is beyond our control.

Our Website may contain links to other websites. We are not responsible for the privacy practices, content or security used by such other websites, which shall not be governed by this Privacy Policy. We advise you to always carefully read the privacy policies on these other websites.

6. Retention of Your Personal Data

- a) We will retain your Personal Data for as long as legally required or for as long as necessary to provide you with any requested services or for any of the other purposes listed in this Privacy Policy. The specific retention term are listed in this Privacy Policy for each of the relevant purposes. We will take reasonable steps to destroy or de-identify Personal Data we hold if it is no longer needed for the purposes set out above or after the expiration of the defined retention term.
- b) PTL shall securely store the personal data of pension contributors, retirees and related persons so collected in hard paper copies, computers, servers and other electronic devices
- c) PTL shall hold personal data of contributor, retirees and related persons for as long as may be deemed necessary to keep track of contribution remittances and payments of benefits. The retention period shall however not be less than the 10 years, in line with the provisions of the National Archives Act, CAP.N6 Laws of the Federation of Nigeria, 2004. The specific retention period of all personal data of contributors, retirees and related persons is also as specified in PTL's archive policy. We will take reasonable steps to destroy or de-identify Personal Data we hold if it is no longer needed for the specific purposes set out above or after the expiration of the defined retention term.

7. Cookies

A major part of the information referred to in this Privacy Policy is collected via our use of cookies and similar techniques. Cookies are small text files containing small amounts of information which are downloaded and may be stored on your user device, e.g. your computer, smartphone or table. Techniques we use that may be similar to cookies are tracking pixels, Java scripts, tags and web beacons. These cookies and similar techniques are sometimes necessary to remember your account settings, language and country, but also enable us to measure and analyze your behaviour on our Website and for showing you personalized advertisements on our Website or on third party websites. Where required, you will be asked for consent to our use of cookies. To view more information on what cookies we use and how we use them please review our separate Cookie Policy in the footer of this Website.

8. Social Media

You may choose to share information on our Website via social media, such as Facebook, Instagram, LinkedIn and YouTube. This means that the information you share, with name and preferences, shall be visible to visitors of your personal pages. We advise you to carefully read the privacy policies of the social media parties as these are applicable to the processing of your Personal Data by these parties.

9. Children's Privacy

The Website is not intended for use by individuals under the age of 18 (or the applicable legal age for consuming the products in question). We do not knowingly collect Personal Data from individuals under the age of 18.

10. Your Rights to Access, Rectification, Deletion, Restriction and Data Portability

You have the right to request an overview of your Personal Data processed by or on behalf of us. You have the right to have your Data rectified, deleted or restricted (as appropriate). You can exercise this right by contacting us with a data privacy request. Please note that requests that do not meet the requirements set out by applicable law or PTL's data protection policy may be requested to be re-issued or ultimately denied and that certain Personal Data may be exempt from such access, rectification and deletion requests pursuant to applicable data protection laws or other laws and regulations. Please note that you can also delete Personal Data by de-activating your user, however we will retain Personal Data where it is legally required for us to do so, which applies e.g. to sales administration.

You have the right to receive the Personal Data that you have provided to us in a structured, commonly used and machine-readable format, and in certain circumstances we will, at your request, transmit your Data to another controller where this is technically feasible.

11. Consent of Data Subject

Collection of data of the contributors, retirees and/or their related persons by PTL shall be subject to the consent and authorization of the data subjects. Consequently, contact update, RSA transfer and Pensioners' annual verification forms, including the electronic formats, contain data authorization clauses which are activated when the data subject completes the form.

12. Your Right to Object

You also have a right, in certain circumstances, to require us to stop processing your Personal Data, but where we have compelling legitimate grounds, we will continue processing your Personal Data. However, you have the right to object to our use of your Personal Data for direct marketing purposes, including profiling, and when you do so, we will accommodate your request. Where you have provided consent to our use of your Personal Data, you have the right to withdraw your consent without this affecting the lawfulness of our use of this Data before your withdrawal.

13. Violation of Data Privacy and Remedies

Contributors, retirees or their related persons whose data privacy rights are violated under this Policy shall report in writing, such violation to PTL for immediate redress.

14. Governing Laws

This Data Privacy Policy is issued by PTL, pursuant to the provisions of the PRA 2014, and it is consistent with Sections 13 of the Constitution of the Federal Republic of Nigeria 1999 (as amended). It is also consistent with Nigeria Data Protection Act, (NDPA) 2023 and Article 8 of the International Convention on Data Protections.

15. Review

This Privacy Policy is subject to review from time to time as the need arises. Any changes to this Privacy Policy will be posted on our Website page and to the extent reasonably possible, will be communicated to you.

16. Contact

If you have any other question, objection to our use of your Personal Data or a complaint about this Privacy Policy or about our handling of your Personal Data, please contact the below person with data privacy request.

Name- Olatunde Yewande

Phone Number- +234 (1) 2717400 Ext 137