

# DATA PROTECTION POLICY

**Company Name:** Thebez Global Resources Ltd

**Effective Date:** 26<sup>th</sup> January 2026

---

## 1. Introduction

Thebez Global Resources Ltd (“the Company”) is committed to protecting the privacy, confidentiality, and security of personal data processed in the course of its business operations. This Data Protection Policy sets out the principles, procedures, and measures adopted by the Company to ensure compliance with the Nigeria Data Protection Regulation (NDPR), the Nigeria Data Protection Act (NDPA), and other applicable data protection laws.

---

## 2. Scope of Application

This Policy applies to: - All employees, directors, and officers of the Company - Contractors, consultants, and temporary staff - Third-party service providers processing personal data on behalf of the Company - All personal data processed through physical or digital means

---

## 3. Definitions

- **Personal Data:** Any information relating to an identified or identifiable natural person.
- **Sensitive Personal Data:** Includes NIN, biometrics, financial data, health data, and other data requiring enhanced protection.
- **Data Subject:** An individual whose personal data is processed.
- **Processing:** Any operation performed on personal data, including collection, storage, use, disclosure, or deletion.

---

## 4. Lawful Basis for Processing

The Company processes personal data based on one or more of the following lawful bases: - Consent of the data subject - Performance of a contract - Compliance with legal or regulatory obligations - Legitimate business interests that do not override data subject rights

---

## 5. Purpose Limitation

Personal data shall be collected and processed only for specified, explicit, and legitimate purposes, including but not limited to: - Identity verification and authentication - Customer onboarding and service delivery - Regulatory compliance and reporting - Fraud prevention and security - Internal administration and record keeping

---

## 6. Data Minimisation

Thebez Global Resources Ltd shall ensure that: - Only data that is necessary for stated purposes is collected - Excessive or irrelevant data is not requested or retained

---

## 7. Accuracy of Data

Reasonable steps shall be taken to ensure that personal data is accurate, complete, and kept up to date. Inaccurate or outdated data shall be corrected or deleted without delay.

---

## 8. Data Security Measures

The Company implements appropriate technical and organisational measures to safeguard personal data, including: - Role-based access controls - Strong password and authentication policies - Encryption of sensitive data where applicable - Secure servers and firewalls - Regular system updates and vulnerability assessments - Physical security controls for offices and records

---

## 9. Data Sharing and Third Parties

Personal data may only be disclosed to third parties where: - Required by law or regulation - Necessary for contractual performance - Adequate data protection safeguards are in place

All third parties must sign data processing agreements where applicable.

---

## 10. Data Subject Rights

Data subjects have the right to: - Access their personal data - Request correction or deletion - Restrict or object to processing - Withdraw consent where applicable - Lodge complaints with regulatory authorities

Requests shall be handled within reasonable timelines in accordance with NDPR.

---

## 11. Data Breach Management

Any suspected or confirmed data breach shall be: - Reported immediately to management - Investigated and documented - Managed in line with internal incident response procedures - Reported to regulators and affected data subjects where required by law

---

## 12. Governance and Responsibility

Management of Thebez Global Resources Ltd is responsible for ensuring compliance with this Policy. A Data Protection Officer (DPO) or designated data protection lead may be appointed to oversee implementation.

---

## 13. Policy Review

This Policy shall be reviewed periodically and updated to reflect legal, regulatory, or operational changes.

---

# DATA RETENTION POLICY

## 1. Purpose

This Data Retention Policy defines how Thebez Global Resources Ltd retains, manages, and disposes of personal data in compliance with the Nigeria Data Protection Regulation (NDPR) and other applicable laws.

## 2. Scope

This Policy applies to all personal data processed by the Company, whether in electronic, physical, or other forms.

### 3. Retention Principles

The Company adheres to the following principles: - Personal data shall be retained only for as long as necessary - Retention shall be aligned with business, legal, and regulatory requirements - Data shall not be retained indefinitely without lawful justification

### 4. Data Retention Periods

Unless otherwise required by law: - **Customer identity and verification data:** Retained for the duration of the business relationship and as required by applicable regulations - **Transaction and audit records:** Retained in accordance with statutory requirements - **Employee records:** Retained in line with labour, pension, and tax laws - **Marketing data:** Retained until consent is withdrawn or data becomes obsolete

### 5. Secure Storage of Retained Data

All retained data shall be: - Stored securely with restricted access - Protected against unauthorised access, loss, or misuse - Backed up regularly where applicable

### 6. Data Disposal and Deletion

Upon expiration of the applicable retention period, personal data shall be: - Securely deleted from electronic systems - Physically destroyed if in hard copy form - Anonymised where deletion is not feasible

### 7. Legal Holds and Exceptions

Personal data may be retained beyond the standard retention period where required for: - Ongoing legal proceedings - Regulatory investigations or audits - Enforcement of contractual or legal rights

### 8. Roles and Responsibilities

Management is responsible for enforcing this Policy. Employees and contractors must comply with retention and disposal requirements.

## 9. Monitoring and Compliance

Compliance with this Policy shall be monitored periodically. Any breach may result in disciplinary action and corrective measures.

## 10. Policy Review

This Policy shall be reviewed periodically and updated as necessary to ensure continued compliance.

### **Approval:**

This Data Protection and Data Retention Policy is adopted by Thebez Global Resources Ltd and is binding on all employees and partners.