


HOBARK INTERNATIONAL LIMITED AND AFFILIATES DATA PROTECTION PRIVACY POLICY

Hobark International Limited and Affiliates
13A Anifowoshe Street, Victoria Island, Lagos

POLICY PREPARED BY	Hobark and Affiliates Data Protection Department
POLICY BECAME OPERATIONAL	March 2018
THE POLICY WAS LAST UPDATED	1 February 2024
MANAGING DIRECTOR SIGNATURE	

Any questions concerning these Privacy Rules may be directed to the:

Hobark International Limited and Affiliates Data Protection Officer

13 A, Anifowoshe Street, Victoria Island Lagos or

admin@hobarkintl.com

DEFINITIONS

ADEQUACY DECISION	shall mean a decision issued by a competent supervisory authority or government body under Applicable Data Protection Law that a country or region or a category of recipients in such country or region is deemed to provide an "adequate" level of data protection.
ARTICLE	shall mean an article in these Privacy Rules.
BINDING CORPORATE RULES	Shall mean a privacy policy of a group of undertakings which, under applicable local law, is considered to provide an adequate level of protection for the transfer of Personal Data within that group of undertakings.
BUSINESS PARTNER	shall mean any Third Party, other than a Customer or Supplier, that has or has had a business relationship or strategic alliance with Hobark and its Affiliates.
BUSINESS PURPOSE	shall mean a purpose for Processing Personal Data or for Processing Sensitive Data as specified in the policy.
CUSTOMER	shall mean any person, private organization, that purchases, may purchase, or has purchased a Hobark and its Affiliates Product or service.
DATA PROTECTION OFFICER (DPO)	shall mean an individual designated or appointed to oversee and ensure compliance with data protection laws, regulations, and internal policies.

DATA CONTROLLER	shall mean the entity or natural person which alone or jointly with others determines the purposes and means of the Processing of Personal Data.
DATA PROTECTION IMPACT ASSESSMENT (DPIA)	<p>shall mean a procedure to conduct and document a prior assessment of the impact which a given Processing may have on the protection of Personal Data, where such Processing is likely to result in a high risk for the rights and freedoms of Persons, in particular where new technologies are used. A DPIA shall contain:</p> <p>A description of:</p> <ul style="list-style-type: none"> ○ the scope and context of the Processing; ○ the Business Purposes for which Personal Data is Processed. ○ categories of recipients of Personal Data, including recipients not covered by an Adequacy Decision. ○ Personal Data storage periods. <p>An assessment of:</p> <ul style="list-style-type: none"> ○ the necessity and proportionality of the Processing; ○ the risks to the privacy rights of Person; and ○ the measures to mitigate these risks, including safeguards, security measures, and other mechanisms (such as privacy-by-design) to ensure the protection of Personal Data.
DATA PROTECTION COMPLIANCE ORGANISATION (DPCO)	These are licensed private entities authorized by the Nigeria Data Protection Commission (NDPC) to provide a range of services related to data protection compliance.
DATA PROTECTION LAW	shall mean the provisions of mandatory law of a

	country containing rules for the protection of individuals with regard to the Processing of Personal Data including rules containing requirements relating to security or the free movement of such Personal Data.
DATA SECURITY BREACH	<p>shall mean the unauthorized acquisition, access, use, or disclosure of unencrypted Personal Data that compromises the security or privacy of such information to the extent the compromise poses a high risk of financial, reputational, or other harm to the Person.</p> <p>A Data Security Breach is deemed not to have occurred where there has been an unintentional acquisition, access or use of unencrypted Personal Data by Staff of Hobark and its Affiliates, a Third Party Processor, or an Employee acting under their respective authority, if:</p> <ul style="list-style-type: none"> ○ the acquisition, access, or use of Personal Data was in good faith and within the course and scope of the employment or professional relationship of such Staff member or other individual; and ○ Personal Data is not further acquired, accessed, used or disclosed by any person.
DEPENDENT	shall mean the spouse, partner, or child belonging to the household of the Employee, or the emergency contact of the Employee.
EFFECTIVE DATE	shall mean the date on which these Privacy Policy become effective as outlined in the Preamble.
EMPLOYEE	<p>shall mean any natural person in the context of the person's employment or similar relationship with Hobark and its Affiliates, such as:</p> <ul style="list-style-type: none"> ○ an employee, job applicant, or former

	<p>employee of Hobark and its Affiliates, including temporary workers working under the direct supervision of Hobark and Affiliates (e.g., independent contractors and trainees). This term does not include employees of Third Parties providing services to Hobark and its Affiliates;</p> <ul style="list-style-type: none"> o a (former) executive or non-executive director of Hobark and its Affiliates
EMPLOYEE DATA	<p>shall mean any information relating to an identified or identifiable natural person (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), insofar as this information relates to an Employee (and his or her Dependents) and is Processed in the context of their (former) employment relationship with Hobark and its Affiliates.</p>
HOBARK AND ITS AFFILIATES	<p>shall mean (collectively) Hobark International Limited, Hobark Consultancy Management Services Ltd, Drillpet International Limited, Southwestern Technologies and Oilfield Services Ltd, Linkpetro Limited, Tuwal</p>
HOBARK INTERNATIONAL LTD (UK)	<p>shall mean Hobark International UK</p>
INDIVIDUAL	<p>shall mean any individual employed by, or any person working for, a Customer, Supplier, or Business Partner and any other individual (other than an Employee) whose Personal Data Hobark and its Affiliates processes in the context of its business</p>

	activities.
INDIVIDUAL DATA	shall mean any information relating to an identified or identifiable natural person (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), insofar as this information relates to an Individual and is Processed in the context of Hobark and Affiliates' business activities.
PERSONAL DATA	shall mean Personal information which includes - Name; Age/date of birth; Sex/gender; Photograph; Marital status; Contact details; Education details; Employment history; Emergency contacts and details of any dependents; Referee details; Immigration status (whether you need a work permit); Nationality/citizenship/place of birth; A copy of your driving license and/or passport/identity card; Financial information (where we need to carry out financial background checks); Social security number (or equivalent in your country) and any other tax-related information; Details about your current remuneration, pensions and benefits arrangements; Information on your interests and needs regarding future employment; Extra information that you choose to tell us; Extra information that your Referees chooses to tell us about you; Extra information that our Clients may tell us about you, or that we find from other third party sources such as LinkedIn, Rigzone, and other job sites; and other information obtained or received by us in connection with your possible and actual work placements.

PERSON	shall mean Employees and Individuals collectively.
PROCESSING	shall mean any operation that is performed on Personal Data, whether or not by automatic means, such as collection, recording, storage, organization, alteration, use, disclosure (including the granting of remote access), transmission, or deletion of Personal Data.
PROCESSOR CONTRACT	shall mean any contract for the Processing of Personal Data entered into by Hobark and Affiliates and a Third-Party Processor.
SENSITIVE DATA	shall mean a special category of personal information or opinion about you, including Membership of a professional or Trade Association or Membership of Trade Union; Criminal Record (if this is required for a role you are interested in applying for); Physical or Mental Health, including Disability-related information, Racial or Ethnic Origin, Political Opinions, Membership of a Political Association, Religious Beliefs or Affiliations, Philosophical Beliefs, Sexual Preferences or Practices. In most cases, sensitive information can only be disclosed with your consent.
STAFF	shall mean all current Employees and other persons acting under the direct authority of Hobark and its Affiliates who Process Personal Data as part of their respective duties or responsibilities towards Hobark and Affiliates using Personal Data technology systems or working primarily from Hobark and Affiliates' premises.
SUPPLIER	shall mean any Third Party that provides goods or services to Hobark and its Affiliates (e.g., an agent,

	consultant, or vendor).
THIRD-PARTY	shall mean any person or entity (e.g., an organization or public authority) outside Hobark and affiliates.
THIRD-PARTY CONTROLLER	shall mean a Third Party that Processes Personal Data and determines the purpose and means of the Processing.
THIRD-PARTY PROCESSOR	shall mean a Third Party that Processes Personal Data on behalf of Hobark and Affiliates and at Hobark and Affiliates' direction as Data Controller.
TRANSFER RESTRICTION	shall mean any restrictions and/or requirements under Applicable Data Protection Law in regard of the transfer of Personal Data from the country in which the Personal Data was collected to another country.

INTERPRETATION OF THIS PRIVACY POLICY

- Unless the context requires otherwise, all references to a particular Article or Annex are references to that Article or Annex in or to this document, as they may be amended from time to time.
- Headings are included for convenience only and are not to be used in construing any provision of these Privacy Rules.
- If a word or phrase is defined, its other grammatical forms have a corresponding meaning.
- the male form shall include the female form.
- The words "include", "includes" and "including" and any words following them shall be construed without limitation to the generality of any preceding words or concepts and vice versa.
- A reference to law or a legal obligation includes any regulatory requirement, sectorial guidance, and best practice issued by relevant national and international supervisory authorities or other bodies.

Privacy Policy

Hobark International Limited (Hobark) and its affiliated companies, (**Link Petro Limited, Tuwal Limited, Hobark Consultancy Management Service, Hobark International (UK) Ltd, and Southwestern Technologies Oilfield Services Limited**), are committed to conducting business with high ethical standards and adherence to applicable laws, focusing on the safeguarding of Personal Data. Our General Business Principles and Code of Conduct underscore this commitment. These Privacy Rules elucidate the measures we take to protect the personal data of current, former, and prospective employees, as well as individuals associated with customers, suppliers, business partners, investors, and any others whose data is processed by Hobark and its affiliates during their activities.

We reserve the right to periodically review and update this policy to align with new laws, technological advancements, operational changes, and evolving practices. Regularly check our privacy policy for updates or modifications. If you do not agree with this privacy policy and our data processing outlined in the Policy, please do not submit any personal data to us.

ABOUT US:

Hobark International Limited and its affiliated companies are duly registered in Nigeria. In conjunction with our mission, Hobark International Ltd collaborates with several companies specializing in Energy integrated services. These companies include:

- **Drillpet International Limited**
- **Linkpetro Limited**
- **Southwestern Technologies and Oilfield Services Limited**
- **Tuwal Limited**
- **Hobark Consultancy Management Services Limited**

Together, we uphold high ethical standards, comply with applicable laws, and prioritize the protection of Personal Data. Our Privacy Rules articulate the measures taken to safeguard the personal data of employees, associates, customers, suppliers, business partners, investors, and any individuals whose data is processed in the course of our activities.

Periodic reviews of our privacy policy ensure its continued relevance in the face of evolving laws, technology, and operational practices. Kindly review our policy regularly to stay informed about updates and changes. If you do not agree with our privacy policy and data processing practices, **please refrain from submitting any personal data to us.**

Additionally, Hobark International (UK) Ltd, registered under RR: Z3259474, provides Recruitment and Consultant Management Services. We serve as a data controller in the United Kingdom, adhering to the provisions of the Data Protection Act 1998. As a data controller in the United Kingdom, we adhere to the provisions of the Data Protection Act 1998. Our commitment is to process the data you provide fairly, lawfully, and conscientiously, using skill and care, and restricting its use to the purposes outlined in this policy

For questions, email hcms@hobarkintl.com or write to Hobark International (UK) Ltd, 28 Bruton Street, Mayfair, London W1J 6QW, United Kingdom. Alternatively, call 0203 813 4484. If you are not satisfied with the way we treated your personal data, you may complain to the local supervisory authority, The Information Commissioner's Office, by phone (0303 123 1113), email (casework@ico.org.uk), or post (Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF).

GOVERNING PRINCIPLES OF DATA PROCESSING IN OUR COMPANY POLICY

Our company is committed to protecting the privacy and security of your personal data. We process your data in accordance with the principles outlined in the Nigeria Data Protection Act (NDPA) 2023, the General Data Protection Regulation (GDPR) 2016/679, and other Applicable data protection laws in the area where we operate. These principles ensure that your data is treated fairly, lawfully, and with respect and they include:

LAWFULNESS, FAIRNESS, AND TRANSPARENCY:

We will only collect and process your data if we have a legal basis to do so, such as your consent, to fulfill a contract, or for legitimate interests. We will be transparent about how we use your data and who we share it with.

PURPOSE LIMITATION

We will only collect and use your data for the specific purposes we have told you about. We will not use your data for any other purpose without your consent.

DATA MINIMIZATION:

We will only collect the minimum amount of data necessary for the purposes we have stated. We will not collect any data that is not relevant or necessary.

DATA ACCURACY:



We will ensure that your data is accurate and up-to-date. You have the right to request that we correct any inaccurate data we hold about you.

STORAGE LIMITATION:

We will not keep your data for longer than is necessary for the purposes for which it was collected. We have data retention policies in place to ensure that your data is deleted securely when it is no longer needed.

INTEGRITY AND SECURITY:

We will take appropriate technical and organizational measures to protect your data from unauthorized or unlawful access, accidental loss, destruction, or damage.

ACCOUNTABILITY:

We are responsible for complying with the NDPA and GDPR. We have appointed a Data Protection Officer who is responsible for overseeing our data protection compliance.

1. SCOPE

This Privacy policy governs the Processing of Personal Data by Hobark International Limited and its affiliated companies, as well as wholly or majority-owned affiliates (referred to individually as "**entities**" and collectively as "**Hobark and Affiliates**").

The rules specifically address the global Processing of Personal Data by Hobark and affiliates in two main contexts:

- a. Individuals, encompassing Customers, Suppliers, Business Partners, and other parties involved in the activities of Hobark and its affiliates (referred to as "**Individuals**" and "**Individual Data**," respectively), and
- b. Employees within the scope of their employment relationship with Hobark and affiliates, except when an Employee is also a customer of Hobark and its affiliates (referred to as "**Employees**" and "**Employee Data**," respectively).

Such Individuals and Employees will collectively be referred to as "**Persons**".

1.1. Electronic and Paper-Based Processing

This Privacy policy applies to the handling of Personal Data through electronic methods and within systematically accessible filing systems in paper format.

2.0 PERSONAL DATA PROCESSING OBJECTIVES

2.1 Objectives for Processing Personal Data

Hobark and its Affiliates may engage in the Processing of Personal Data for one or more of the following:

➤ **INDIVIDUAL DATA:**

- **Business Process Execution, Internal Management, and Management Reporting:** This encompasses activities such as work scheduling, time recording, management of company and Employee assets (including IT systems and infrastructure), risk management, internal audits and investigations, finance and accounting, implementation of business and IT security controls, provision of central processing facilities for efficiency, management reporting and analysis and insurance purposes, legal or business consulting, and preparation for or engagement in dispute resolution.
- **Health, Safety, Security, and Integrity:** This includes safeguarding the security and integrity of the business sector in which Hobark and its affiliates operate. It involves protecting the interests of Hobark, its affiliates, Employees, and Customers. This purpose covers screening and monitoring of Persons before and during employment or other engagements, including checks against publicly available government and/or law enforcement agency sanctions lists and other third-party data sources. It also addresses the detection, prevention, investigation, and combating of (attempted) fraud and other criminal or objectionable conduct directed against Hobark, its affiliates, Employees, or Customers. Additionally, it covers activities related to health and safety, protection of assets (including IT systems and infrastructure), and authentication of Customer, Supplier, Business Partner, or Employee status and access rights, such as screening activities for access to Hobark and its affiliates' premises or systems.
- **Legal Compliance:** This concerns the Processing of Personal Data that is essential for fulfilling tasks necessary to comply with legal obligations imposed on Hobark and its affiliates. It encompasses the disclosure of Personal Data to government institutions and supervisory authorities, including tax and other competent entities within the sector where Hobark and its affiliates operate. The purposes of such processing include preventing activities like money laundering, financing terrorism, and other criminal actions, conducting customer due diligence, and fulfilling the duty of care towards Customers (e.g., credit monitoring).
- **Enhancement of Products and/or Services:** This objective involves processing Individual Data essential for the development and improvement of products and/or services offered by Hobark and its affiliates companies. This may encompass tasks such as collecting and analyzing customer feedback and evaluating how Individuals utilize Hobark and its affiliates' products and/or services.
- **Provision of Customer Services:** This involves processing Individual Data essential for delivering services by Hobark and its affiliates to Customers, Client, supporting the products and services offered by Hobark and its affiliated companies, including energy products. These services encompass activities such as recruitment, maintenance, upgrades, replacements, inspections, and related support, all aimed at facilitating the ongoing and sustained use of

products and services provided by Hobark and its affiliates.

- **Preserving Individuals' Vital Interests:** This involves processing that is essential to safeguard the crucial interests of individuals, including making arrangements to protect their interests in situations related to health, safety, and security.

➤ **Employee Data Exclusively:**

- **Human Resources and Personnel Management:** This involves Processing necessary for the execution of an employment or other contractual arrangement with an Employee (or undertaking essential measures at the Employee's request before entering into a contract). It includes activities carried out by the human resources department, such as the management and administration of recruiting, outplacement, employability, leave, and other absences, compensation and benefits (including pensions), payments, tax matters, career and talent development, performance evaluations, handling grievances and complaints, training, (including travel and relocation), and Employee communications.
- **Organizational Analysis and Development, Management Reporting:** This purpose encompasses various activities, such as conducting Employee surveys and Processing Employee Data for management reporting and analysis.

3.0 TYPES OF INFORMATION WE COLLECT.

3.1 For Candidates and Employees:

- **To provide the best possible employment opportunities,** we may collect data about you, both personal information and also sensitive data where appropriate and in accordance with local laws and requirements.
- **Supporting workplace diversity programs** to eliminate or reduce inequality or to ensure diversity in staffing, provided that the use of relevant racial or ethnic Employee Data allows for an objective determination that an Employee belongs to a minority group and the Employee has not objected in writing against the relevant Processing.
- **Administering pensions,** health, and welfare benefit plans, maternity, paternity, or family leave programs, or collective agreements (or similar arrangements) that create rights depending on the state of health of the Employee.
- **Reintegrating or providing support** for Employees entitled to benefits in connection with illness or work incapacity.
- **For screening and monitoring of Employees** before and during employment and for assessing and making decisions on (continued) eligibility for positions, projects, or scope of responsibilities.
- **Biometric Personal Data (e.g., fingerprints):** For the protection of Hobark and Employee assets, access to online services, site access, and security reasons.

- **Administering** Employee pensions and benefits programs.
- **Administering** Employee memberships.

3.2 For referees and emergency contacts:

- To request a reference in support of a candidate's employment opportunity, we will require the referee's contact details, including their Name, Email address, and Telephone Number. These details are also essential if our candidate or a member of our staff has designated you as their Emergency Contact, enabling us to reach out to you in the event of an accident or emergency.

3.3 For Guarantor:

- To secure a guarantee for a candidate who is already employed and is required to provide a guarantor, we will need the guarantor's contact details, including their Name, Email address, and Telephone Number." Bring to your notice matters which are likely to be relevant and useful to you.

3.4 For clients:

- **we generally only need limited data such as** Contact details or the details of individuals at your organization (such as their Names, Telephone Numbers, and Email Addresses) to enable us to provide you with (i) Recruitment Solutions; (ii) Consultant Management Services; (iii) Training; (iv) Integrated Oilfield Project Management Services and; (v) Bring to your notice matters which are likely to be relevant and useful to you.
- **As necessary for assessing** and accepting Individuals and executing agreements with Individuals.

3.5 For Suppliers:

- We will gather your contact details or those of pertinent individuals within your organization, including their names, telephone numbers, and email addresses, to facilitate communication. Additionally, we will collect bank details for payment purposes, should it be stipulated in our contractual agreement for the services you provide. Furthermore, we may retain any additional information that a representative of your organization opts to share with us.

4.0 HOW WE COLLECT INFORMATION FROM YOU

4.1 In the case of *Candidates*, we may collect personal or sensitive data Directly from You or third parties when:

- You complete one of our application forms or provide any other information in connection with your application.
- You leave a hard copy CV at a Hobark recruitment event, job fair, or office.
- You email your CV to Hobark recruiters or are qualified by them.

- You apply for a job through the Hobark website.
- We search for potential Candidate from third-party sources, such as LinkedIn, Rigzone, and other job sites
- You are referred to us through another manpower services company, which may share personal information about you with us.
- We receive any reference, where referees may disclose personal information about you
- We receive results of inquiries that we might make of your former employers, work colleagues, professional associations, or registration body.
- Clients share personal information about you with us.
- We receive the results of any competency or medical test or any background check, including credit and criminal record checks.
- We receive any information about any insurance investigation, litigation, registration or professional disciplinary matter, criminal matter, inquest, or inquiry in which you were involved.
- We receive any information about a workplace accident in which you are involved.
- We receive any complaint or other information from or about you in the workplace.
- You provide us with any additional information about you.

4.2 For Clients, we may collect personal data directly from you or third-party sources when:

- You contact us proactively, usually by phone or email; and/or
- We contact you, either by phone or email or through our recruiters' business development activities more generally.
- We receive third-party market research and by analyzing online and offline media.
- We receive delegate lists at relevant events.
- Our Candidates provide us with your details to act as a referee for them

4.3 For Suppliers, we may collect personal data directly from you or third-party sources when:

- We contact you, either by phone or email; and/or You contact us proactively, usually by phone or email.
- We receive delegate lists at relevant events.

4.4 For others such as referees and emergency contacts

- we may collect your contact details only where a Candidate or a member of our Staff puts you down as their Emergency Contact or where a Candidate gives them to us for you to serve as a Referee

5.0 HOW WE USE YOUR PERSONAL DATA.

5.1 For Candidates,

The main reason for using your personal details is either to help you find employment and/or manage you as a consultant. So, we generally use Candidate data for Recruitment and Consultant Management Activities. The various ways in which we may use and process your personal data for this purpose, where appropriate and in accordance with any local laws and requirements is listed below (though not exhaustive);

- Collecting your data from you and other sources, such as LinkedIn, Rigzone, etc;
- Storing your details (and updating them when necessary) on our database, so that we can contact you in relation to recruitment.
- Providing you with our recruitment services and to facilitate the recruitment process;
- Assessing data about you against vacancies that we think may be suitable for you;
- Sending your information to Clients, in order to apply for jobs or to assess your eligibility for jobs;
- Carrying out our obligations arising from any contracts entered into between us;
- Carrying out our obligations arising from any contracts entered into between Hobark and third parties in relation to your recruitment.
- Facilitating our payroll and invoicing processes.
- Carrying out customer satisfaction surveys to improve our customer service;
- Answer your questions and inquiries;
- Verifying details you have provided, using third-party resources (such as psychometric evaluations or skills tests), or requesting information (such as references, qualifications, and potentially any criminal convictions, to the extent that this is appropriate and in accordance with local laws);
- Complying with our legal obligations in connection with the detection of crime or the collection of taxes or duties.
- Processing your data to enable us to send you targeted, relevant marketing materials or other communications which we think are likely to be of interest to you, or to ask for your help with connecting other Candidates with jobs;
- Enabling us to develop and market other products and services;
- Marketing our full range of Manpower services to you;
- Displaying promotional excerpts from your details on Hobark's and affiliates website(s) as a success story (only where we have obtained your express consent to do so);
- Helping us to establish, exercise, or defend legal claims;
- We may use your personal data for the above purposes if we deem it necessary to do so for our legitimate interests as a data controller. From time to time we may seek your consent to process, use, or disclose your information for any other purpose not listed above.

5.2 For Clients

We use your information to provide you with suitable candidates to manage your operations, as well as manage consultants deployed to your sites. To facilitate these, we use your data in the various ways listed below:

- Maintaining our business relationship.
- Storing your details (and updating them when necessary) on our database, so that we can contact you in relation to work/ service activities.
- Keeping records of your instructions, our conversations, and meetings, so that we can provide requested services to you.
- Undertaking customer satisfaction surveys; and
- Processing your data for the purpose of targeting appropriate marketing campaigns.
- Helping us to establish, exercise, or defend legal claims.

5.3 For Supplier

We use your information to request for support and services and to facilitate these, we may use your data in the following ways:

- Hobark and its Affiliates may collect necessary information during the supplier onboarding process.
- If the legal basis for processing this data is the necessity of processing for the performance of a contract.
- During the onboarding process, Hobark and its Affiliates may communicate to suppliers the purpose of collecting their personal data, such as for maintaining business relations, fulfilling contractual obligations, and processing payments.

6.0. WHO WE SHARE YOUR PERSONAL DATA WITH

Where appropriate and in accordance with local laws and requirements, we may share your personal data, in various ways and for various reasons, with the following categories of individuals or organizations:

- Any of our Hobark Affiliate Companies, whose locations can be found at www.hobarkintl.com;
- Potential employers and third-party partners to increase your chances of finding employment.
- Individuals and organizations who hold information related to your reference or application to work with us, such as current, past, or prospective employers, educators, and examining bodies and employment and recruitment agencies.
- Tax, audit, or other authorities, when the law or other regulation requires us to share this data (for example, because of a request by a tax authority or in connection with any anticipated litigation).
- Third-party service providers who perform functions on our behalf (including external consultants, business associates, and professional advisers such as lawyers, auditors, and accountants, and technical support functions)
- Third parties whom we have retained provide services such as reference, qualification, and criminal convictions checks, to the extent that these checks are appropriate and in accordance with local laws.
- We may transfer your information to a third party in the event of a sale, merger, liquidation, receivership, or transfer of all or substantially all of the assets of Hobark provided that the third party agrees to adhere to the terms of this Privacy Policy and provided that the third party only uses your Personal Data for the purposes that you provided it to us. You will be notified in the event of any such transfer, and you will be afforded an opportunity to opt-out.

- o To ensure that your personal information receives an adequate level of protection, we have put in place appropriate procedures with the third parties we share your personal data with to ensure that your personal information is treated by those third parties in a way that is consistent with, and which respects the laws on data protection.

7.0 Data Transfers to Third Parties

7.1 Transfers by Hobark and its Affiliates to Third-Party Controllers and Processors

Hobark and its Affiliates may transfer Personal Data to third parties for Processing when necessary for the Business Purpose or upon obtaining the Person/individual's consent.

7.2 Data Transfers to Third Party Controllers.

Hobark and its Affiliates may transfer Personal Data to a third-party Controller (other than a government agency) only if it has a valid contract, in which Hobark and its Affiliates shall seek to protect the data protection interests of Persons. This provision does not apply in case of incidental transfers of Personal Data to a Third Party Controller, such as, when a reference is provided for an Employee or where details are shared for purposes of ordering (semi) public services (e.g. making reservations for transport services or hotel bookings).

7.3 Data Transfers to Third-Party Processors.

Hobark and its Affiliates may transfer Personal Data to third-party Processors ("Third Party Processors" or "Processors") only when a valid contract, known as a "Processor Contract," is in place. The Processor Contract must include the following provisions:

- The Processor shall Process Personal Data solely for purposes authorized by Hobark and its Affiliates and in accordance with their documented instructions. This includes transfers of Personal Data to any Processor not covered by an Adequacy Decision, unless the Processor is compelled to do so by mandatory requirements applicable to the Processor, and such requirements are communicated to Hobark and its Affiliates.
- The Processor shall maintain the confidentiality of Personal Data and impose confidentiality obligations on its staff with access to such data.
- The Processor shall implement appropriate technical, physical, and organizational security measures to safeguard Personal Data. Additionally, the Processor shall promptly notify Hobark and its Affiliates of any Data Security Breach involving Personal Data.
- The Third-Party Processor shall assist Hobark and its Affiliates in ensuring compliance with the obligations of the Nigeria Data Protection Act, Nigeria Data Protection Regulation, and GDPR, considering the nature of Processing and the information available to the Processor.

- The Processor shall only allow subcontractors to Process Personal Data in connection with their obligations to Hobark and its Affiliates with the prior specific or generic consent of Hobark and its Affiliates. This is subject to a validly executed written or electronic contract with the subcontractor, imposing similar privacy protection-related Processing terms as those in the Processor Contract. The Processor remains liable for the subcontractor's performance, and if generic consent is given, the Processor must notify Hobark and its Affiliates of any subcontractor changes, allowing objections based on reasonable grounds.
- The Processor shall assist Hobark and its Affiliates in responding to Individuals' requests to exercise their rights under the Data Protection Law.
- The Processor shall provide Hobark and its Affiliates with information necessary to demonstrate compliance with obligations under the Processor Contract, allowing for and contributing to audits, including inspections, conducted by Hobark and its Affiliates or another auditor mandated by Hobark and its Affiliates.
- Upon termination of the Processor Contract or earlier as directed by Hobark and its Affiliates, the Processor shall, at Hobark and its Affiliates' option, return the Personal Data and copies to Hobark and its Affiliates or securely delete such Personal Data, unless the Processor Contract or applicable law dictates otherwise. Internal

Processors may Process Personal Data only if they have a validly entered into written or electronic contract with the Hobark and its Affiliates being the Controller of the relevant Personal Data, which contract must in any event include the provisions set out above.

7.4 Transfers to Third Parties (Subject To Transfer Restrictions)

Subject to the Consent for Processing of Personal Data, the transfer of Personal Data subject to a Transfer Restriction to a Third Party located outside the country of collection is permissible under the following conditions:

- The Third Party is covered by an Adequacy Decision.
- The transfer is essential for the performance or management of a contract with the individual or for taking necessary pre-contractual steps at the individual's request (e.g., processing orders, and job applications).
- A contract has been established between Hobark and its Affiliates and the relevant Third Party, stipulating that the Third Party: (a) adheres to the terms of these Privacy Rules as if it were Hobark and its Affiliates; (b) provides safeguards at a level of protection similar to that offered by these Privacy Rules; or (c) is recognized.
- The transfer is necessary for the conclusion or performance of a contract in the

individual's interest between Hobark and its Affiliates and a Third Party (e.g., booking an airline ticket).

- The Third Party has implemented Binding Corporate Rules or a similar transfer control mechanism recognized under applicable Data Protection Law as providing an 'adequate' level of privacy protection.
- The transfer is necessary to protect a vital interest of the individual.
- The transfer is necessary for the establishment, exercise, or defense of a legal claim.
- The transfer is necessary for the performance of a task carried out to comply with a legal obligation to which the relevant Hobark and its Affiliates Group Company is subject.

The last condition requires the prior approval of the Data Protection Officer. The requirements outlined apply to the requesting, denial, or withdrawal of the individual's consent.

7.5 Transfers between Non-Adequate Countries

Apart from the earlier mentioned transfers of Personal Data gathered in association with the operations of Hobark and its Affiliates based in a country without Transfer Restrictions, additional transfers to a Third Party are allowed if they are:

- Essential to comply with a legal obligation binding on the transferring Hobark and its Affiliates Group Company.
- Required to serve the public interest.
- Essential to fulfill a Business Purpose of Hobark and its Affiliates Group Company.

8.0 CONSENT FOR PROCESSING OF PERSONAL DATA

- Where required or permitted by applicable law, Hobark and its Affiliates will or may obtain consent from individuals/ persons before Processing Personal Data. (Consent should be freely given without any coercion). We're likely to provide a tick box for you to check or a privacy notice for you to read and sign so that this requirement is met clearly and unambiguously.
- When requesting consent, Hobark, and its Affiliates will communicate to the individuals/persons the purposes of the processing and identify the entities within Hobark and its Affiliates responsible for the processing.
- Hobark and its Affiliates will also inform the Person about the right to withdraw consent at any time (and for Employee Data, without consequence to the Employee's employment relationship), and that withdrawal of consent does not affect the lawfulness of the relevant Processing before such withdrawal.

- Upon withdrawal of consent, Hobark and its Affiliates will discontinue Processing as soon as reasonably practical. The withdrawal of consent shall not affect (i) the lawfulness of the Processing based on such consent before its withdrawal and (ii) the lawfulness of Processing for Business Purposes not based on consent, after withdrawal.
- We will keep records of the consent that you have given in this way.
- In some cases, we will be able to rely on soft opt-in consent. We are allowed to market products or services to you which are related to the recruitment services we provide as long as you do not actively opt-out from these communications.

8.1 Additional Requirements for Employee Data on Consent:

Except as detailed below, Employee consent will typically not serve as the legal basis for processing Employee Data. The existence of one of the Business Purposes is a prerequisite for any Employee Data processing.

Consent may be sought from Employees only under the following circumstances:

- If none of the Business Purposes is applicable, Hobark and its Affiliates may request Employee consent for processing Employee Data, provided that the processing poses no foreseeable adverse consequences for the Employee.
- If local law mandates that Hobark and its Affiliates secure Employee consent for the relevant processing, in addition to ensuring a Business Purpose exists, Hobark and its Affiliates will also seek Employee consent.
- In the case of an individual applying for employment or other work engagement with Hobark and its Affiliates, Hobark, and its Affiliates may seek the individual's consent to process their Employee Data for the purpose of evaluating their application.

8.2 Direct Marketing

- In compliance with the law, Hobark and its Affiliates will only send direct marketing communications to an individual with their prior opt-in consent. Persons will be provided with the option to opt out of future direct marketing communications and to voice objections to further communication.
- If an individual expresses objection to receiving marketing communications from Hobark and its Affiliates or withdraws their consent for such materials, Hobark and its Affiliates will promptly refrain from sending additional marketing materials as explicitly requested. This will be done within the timeframe mandated by applicable law.
- No Personal Data shall be disclosed to, or utilized on behalf of, Third Parties for direct marketing purposes without the prior consent of the individual.

8.3 Automated Decisions

Automated tools may be employed to make decisions regarding individuals, but decisions carrying a potentially significant negative impact on the individual will not be solely based on the outcomes provided by such tools. This limitation, however, does not apply if:

- a. The use of automated tools is essential for the performance of a task required to comply with a legal obligation to which Hobark and its Affiliates are subject.
- b. The decision is made by Hobark and its Affiliates for the purposes of (a) entering into or performing a contract, including assessing creditworthiness, and eligibility, and for fraud prevention purposes.
- c. Managing a contract, provided that the underlying request leading to a decision by Hobark and its Affiliates was initiated by the individual.
- d. The decision is made based on the explicit consent of the individual.

Hobark and its Affiliates will implement appropriate measures to safeguard the rights and legitimate interests of individuals. When Personal Data is processed pursuant to items (a) and (c) above, Hobark and its Affiliates shall afford the affected individual the opportunity to express their point of view concerning the automated decision or request human intervention from Hobark and its Affiliates.

8.4 SAFEGUARD OF PERSONAL DATA

- Whether you engage with us in person, over the phone, through mail, on the internet, or via other electronic means, safeguarding the privacy of your information is of utmost importance. To ensure this, we implement reasonable technical and organizational measures to protect the personal information we possess. These measures are designed to prevent misuse, interference, loss, unauthorized access, modification, or disclosure, and include protocols for addressing any suspected data breaches.
- We store personal information in secure computer storage facilities (servers) with encryption, access controls, and regular backups, and for paper-based files and other records, they are kept in secure storage areas with restricted access to ensure confidentiality. files are kept in locked cabinets, tracked for access, and ultimately destroyed using secure methods like shredding or pulping once they are no longer needed. However, once we determine that certain information is no longer required, we will either eliminate any details that could identify you or securely destroy the records, applying the same stringent measures to both electronic and paper-based data.

8.5 No Excessive Personal Data and Storage Period

Hobark and its affiliates shall only Process Personal Data in so far as this is reasonably adequate for, relevant and limited to its Business Purpose(s). Hobark and its Affiliates shall

only retain Personal Data for as long as needed for such Business Purposes, including in particular as needed to comply with retention requirements under applicable law. Hobark and its Affiliates shall take reasonable steps to delete, de-identify or destroy (e.g., by scrambling) Personal Data that is not required for the applicable Business Purpose. Hobark and its Affiliates maintains data and records retention schedules that define the appropriate retention periods.

When the applicable storage period has ended, the Personal Data will be promptly deleted, destroyed, de-identified or (if appropriate) transferred to an Archive (unless this is prohibited by law or an applicable records retention schedule).

9.0 RIGHTS OF PERSONS

9.1 Right of Access

Every individual has the entitlement to request access to their Personal Data processed by or on behalf of Hobark and its Affiliates. Furthermore, where feasible, access to the information outlined in Article 3 or, if applicable, Article 4 is also granted. Additionally, in accordance with relevant Data Protection Laws, the individual has the right to receive a copy of the Personal Data undergoing processing, subject to any exemptions specified by applicable Data Protection Law. This right is exercised without adversely affecting the rights and freedoms of others.

9.2 Right to Rectification, Deletion, and Restriction

If Personal Data is no longer necessary, no other lawful purpose to retain the personal data, inaccurate, incomplete, or not processed in accordance with these Privacy Rules, the individual/person retains the right to rectify, delete, or restrict the processing of their Personal Data as deemed appropriate. In cases where Personal Data, which should be deleted, has been made public by Hobark and its Affiliates, they will not only erase the pertinent Personal Data but also undertake commercially reasonable measures to notify Third Parties engaged in processing or linking to the specific Personal Data that the individual has requested its deletion from such Third Parties.

9.3 Right to Object

The Persons/individuals possess the right to raise objections to:

- The processing of their Personal Data, grounded on compelling reasons specific to their situation, unless Hobark and its Affiliates can establish a prevailing legitimate interest for the processing.
- The reception of marketing communications based on the stipulations of Article 7, encompassing any associated profiling.

9.4 Restrictions to Rights of Persons

The rights of Persons set out in Articles 9.1 – 9.3 above do not apply in one or more of the

following circumstances:

- The processing is required or allowed for the performance of a task carried out to comply with a legal obligation of Hobark and its Affiliates.
- The processing is necessary for exercising the right of freedom of expression and information.
- For dispute resolution purposes.
- The exercise of the rights by the Persons adversely affects the rights and freedoms of Hobark and its Affiliates or others; or
- In case a specific restriction of the rights of Persons applies under applicable Data Protection Law.

9.5 Procedure for Data Subject Requests By Persons

• Procedure

A request to exercise the rights outlined in this Article should be submitted following the specified procedure. Persons wishing to make such requests should send them to Hobark and Affiliates' **Data Protection Officer** via email at admin@hobarkintl.com

Before addressing the Person's request, Hobark and its Affiliates may ask the Person to:

- Clearly outline the categories of Personal Data they seek access to.
 - Identify, to the extent reasonably possible, the system where the Personal Data is likely stored.
 - Provide details on the circumstances under which Hobark and its Affiliates obtained the Personal Data.
 - Present proof of identity if there are reasonable doubts about such identity or furnish additional information for identification purposes.
 - Pay a fee to cover reasonable costs associated with fulfilling the request if Hobark and its Affiliates can reasonably demonstrate that the request is manifestly unfounded or excessive, such as due to its repetitive nature.
 - In the case of a request for rectification, deletion, or restriction, explain the reasons why the Personal Data is deemed incorrect, incomplete, or not processed in compliance with Data Protection Law or these Privacy Rules
- Response Period

Within a period of one calendar month from the receipt of the request and any required information mentioned above, Hobark and its Affiliates will communicate with the individual either in writing or electronically. The communication will include (i) Hobark and its Affiliates' stance regarding the request and any actions taken or planned in

response, or (ii) the final date by which the individual will be informed of Hobark and its Affiliates' position, along with the reasons for any delay. This communication will be provided no later than two calendar months from the end of the original one-month period.

- **Denial of Requests**

Hobark and its Affiliates retain the right to deny a Person's request under the following circumstances:

- If the request fails to meet the requirements outlined in Articles 9.1 - 9.3 or satisfies the conditions in Article 9.4.
- If the request lacks sufficient specificity.
- If the identity of the relevant Person cannot be reasonably established, even with additional information provided by the Person.
- If Hobark and its Affiliates can reasonably demonstrate that the request is manifestly unfounded or excessive, such as due to its repetitive nature. Generally, a time interval between requests of six months or less is considered unreasonable.
- If the processing is necessary for the performance of a task to comply with a legal obligation of Hobark and its Affiliates.
- If the processing is necessary for a task carried out in the public interest, for statistical purposes, for exercising the right of freedom of expression and information, or for dispute resolution purposes.
- If the request violates the rights and freedoms of Hobark and its Affiliates or others.
- If a specific restriction of the rights of Persons applies under the Data Protection Law.

9.6 COMPLAINTS AND ENFORCEMENT OF RIGHTS

Individuals/ Persons can submit a written complaint regarding any claims they have on data breach to the Hobark and Affiliates Data and Protection Officer. The Data Protection Officer will oversee the complaint-handling process and will:

- Promptly acknowledge receipt of the complaint.
- Analyze the complaint and, if necessary, initiate an investigation.
- Maintain comprehensive records of all received complaints, responses provided, and remedial actions taken by Hobark and its affiliates.

Hobark and Affiliates will make reasonable efforts to resolve complaints promptly, aiming to provide a response to the individual within one calendar month from the filing date. The response, communicated in writing, will be sent through the original means of contact (e.g., mail or email) or alternative means agreed upon by the individual. The response will outline the steps taken by Hobark and Affiliates to investigate the complaint and convey the decision regarding any steps to be taken as a result of the complaint.

If Hobark and Affiliates cannot reasonably complete the investigation and respond within one month, the individual will be informed within one calendar month that the investigation is ongoing, with an assurance of a response within the next two calendar months.

9.7 Enforcement Rights of Persons

- The rights contained in this policy are in addition to, and shall not prejudice, any other rights or remedies that these Persons may otherwise have under applicable Data Protection Laws.
- Individuals/Persons are encouraged to first file a complaint with Hobark and its Affiliates before filing any complaint or claim with a Nigeria Data Protection Commission or court.

9.8 Circumstances in which you are entitled to request that we restrict the processing of your data are:

- where you dispute the accuracy of the personal data that we are processing about you;
- where you object to our processing of your personal data for our legitimate interest.

10.0 Data Breach Detection, Reporting, and Investigation Procedures

10.1 This section outlines the procedures for effectively detecting, reporting, and investigating personal data breaches within Hobark and its affiliates to protect individuals' privacy and minimize potential harm.

10.2 Breach Detection:

We employ various tools and techniques to detect data breaches, including:

- Firewalls Intrusion detection/prevention systems (IDS/IPS),.
- Antivirus software, Endpoint security tools network devices, Applications, and Operating systems)
- Intrusion detection systems
- Data loss prevention tools
- Regular security audits and vulnerability assessments

10.3 Incident Response and Data Breach Management:

To ensure the effective detection, reporting, and investigation of personal data breaches, we have implemented the following procedures:

- **Data Protection Officer (DPO) Responsibilities:** We have appointed a dedicated Data Protection Officer responsible for overseeing data protection activities, including the management of data breaches our DPO can be reached at this email: admin@hobarkintl.com
- **Incident Response Team:** An incident response team, consisting of experts in IT,

legal, and compliance, is in place to manage data breaches promptly and efficiently.

- **Clear Reporting Channels:** Individuals, persons, and Employees are encouraged to report any potential breaches through clearly defined and communicated reporting channels.
- **Incident Reporting Form:** A standardized incident reporting form ensures consistency in the information collected during the reporting process.

10.4 **Response Plan:**

An incident response plan outlines the steps to be taken when a breach is detected, including containment, notification, and recovery procedures.

10.5 **Reporting Procedures:**

- Any suspected data breach, regardless of size or perceived impact, must be reported immediately to the designated individual/department through [designated reporting channels, i.e. email address].
- Reporting must include details such as:
 - Nature of the suspected breach
 - Potentially affected data
 - Timeframe of the suspected breach
 - Any known or suspected source of the breach

10.6 **Continuous Improvement:**

We are committed to ongoing improvement of our data protection practices and will regularly review and update these procedures to reflect changes in technology, laws, and best practices.

11.0 **ROLE OF HOBARK AND ITS AFFILIATES**

Hobark and its Affiliates have designated a data protection officer to oversee the coordination and implementation of this Privacy Rule.

11.1 **PRIVACY GOVERNANCE**

The Data Protection Officer is responsible for overseeing and ensuring compliance with these Privacy Rules. This includes reporting annually on data protection risks and compliance issues to Hobark and its Affiliates' highest management level. Additionally, the Data Protection Officer is tasked with coordinating investigations and inquiries into the Processing of Personal Data by Data Protection Authorities.

11.3 **POLICIES AND PROCEDURES**

These Privacy Rules complement all existing Hobark and its Affiliates' privacy policies, guidelines, and notices as of the Effective Date. Hobark and its Affiliates will develop and implement policies and procedures to adhere to these Privacy Rules.

11.4 STAFF TRAINING

Hobark and its Affiliates will provide training to Staff involved in Processing Personal Data on the obligations and principles outlined in these Privacy Rules, along with related confidentiality and security obligations.

11.5 SYSTEM INFORMATION

Hobark and its Affiliates will maintain readily available information regarding all Processing activities in accordance with the Data Protection Law. A copy of this information will be provided to the Data Protection Agency competent to audit under the applicable law.

11.6 DATA PROTECTION IMPACT ASSESSMENT

Hobark and its Affiliates will establish a procedure to conduct and document a Data Protection Impact Assessment when a Processing activity is likely to result in a high risk to the rights and freedoms of individuals, especially when new technologies are employed. If the Data Protection Impact Assessment reveals a residual high risk despite mitigating measures, the DPCO will be consulted before such Processing occurs.

12.0 PROCEDURES FOR MONITORING AND AUDITING COMPLIANCE

12.1 Internal Audits

Hobark and its Affiliates International, through its Internal Audit function, will conduct audits of business processes and procedures involving the Processing of Personal Data to ensure compliance with these Privacy Rules. This includes implementing corrective actions as needed.

Audits will be part of the routine activities of Hobark and its Affiliates' Internal Audit or may be initiated at the request of the Data Protection Officer. The Data Protection Officer may also request an external auditor to conduct an audit as specified in this Section. Audits will adhere to applicable professional standards of independence, integrity, and confidentiality. The results of the audits will be communicated to the Data Protection Officer. Any violations of these Privacy Rules identified in the audit report will be reported to the corresponding entities.

12.2 Audit by the Data Protection Compliance Organization (DPCO)

Subject to Data Laws, the DPCO may initiate an audit of the facilities used by Hobark and its Affiliates for Processing Personal Data to ensure compliance with this Privacy Rule. Hobark and its Affiliates will facilitate such audits through the following actions:

- Data sharing: Hobark and its Affiliates will attempt to address the audit request by providing information to the DPCO, including information on Hobark and its Affiliates's internal assurance or audit reports, assurance or audit reports of an affected supplier, discussions with subject matter experts, and reviewing security, privacy, and operational controls in place.
- Examinations: If the DPCO finds the information obtained through these methods

insufficient to meet their objectives, Hobark and its Affiliates will allow the DPCO to communicate with Hobark and its Affiliates' internal or independent external auditor. If necessary, the DPCO will have a direct right to examine Hobark and its Affiliates' data processing facilities with reasonable prior notice during business hours. Full respect will be given to the confidentiality of obtained information and the trade secrets of Hobark and its Affiliates. Audits will follow the relevant national procedural laws.

This Privacy Rule only provides supplemental audit rights to DPCO and does not diminish any audit rights that a DPCO may have under applicable law.

12.3 Annual Privacy Report

The Data Protection Officer will generate a periodic privacy report for Hobark and its Affiliates' highest management level, covering compliance with these Privacy Rules, privacy protection risks, and other pertinent issues.

12.4 Sanctions for Non-Compliance

These Privacy Rules are binding on Hobark and its Affiliates, and all Staff must comply with them as implemented by relevant policies and guidelines. Non-compliance may result in disciplinary action in accordance with Hobark and its Affiliates' policies and local law, including potential termination of employment or contract.

12.5 Establishing, Exercising or Defending Legal Claims

Sometimes it may be necessary for us to process personal data and, where appropriate and in accordance with applicable laws and regulations, sensitive personal data in connection with exercising or defending legal claims. This may arise for example where we need to take legal advice in relation to legal proceedings or are required by law to preserve or disclose certain information as part of the legal process.

12.6 Our Website and Links to other Websites

- Our website may contain links to other websites run by other entities or organizations. Please note that clicking on links banner advertisements and RSS feeds may result in your transfer to another website, where data privacy practices may be different to this privacy policy.
- It is your responsibility to check other website privacy policies to ensure that you are happy for your personal information to be used in accordance with those third parties' privacy policies. We accept no responsibility for and have no control over third-party websites, links, adverts RSS feeds, or information that is submitted or collected by third parties.

12.7 Change to our Privacy Policy

Any changes to this Privacy Policy will be posted on the Hobark and Affiliates website so you are always aware of what information we collect, how we use it, and under what circumstances, if any, we disclose it. If at any time we decide to use Personal Data in a manner significantly different from that stated in this Privacy Policy, or otherwise disclosed to you at the time it was collected, we will notify you by email, and you will have a choice as to whether or not we use your

information in a new manner. Continued use of the website or our services after such changes will constitute your acceptance of such changes.

12.8 QUESTIONS AND COMPLAINTS

Any questions or complaints regarding this policy and our privacy practices should be sent by email to admin@hobarkintl.com or by writing to Hobark International Ltd, 13A Anifowoshe Street, Victoria Island, Lagos, Nigeria. Alternatively, you can telephone +1 832 295 9089.

ANNEXURE 1

DATA RETENTION POLICY

- Hobark and its Affiliates employ comprehensive data and records retention schedules, meticulously detailing the appropriate retention periods for all information assets.
- In accordance with industry best practices and relevant regulations, Hobark and its Affiliates maintain rigorously defined data and records retention schedules, ensuring the optimal retention periods for all data and records are identified and adhered to.

Specific:

- To comply with the Nigeria Data Protection Act and other applicable data laws, Hobark, and its Affiliates maintain data and records retention schedules specifying that financial records must be retained for at least **six [6] years and customer data for at least six [6] years.**
- Hobark and its Affiliates leverage a tiered data and records retention schedule, with critical business documents retained for at least five [5] years, operational data for at least five[5] years, and sensitive information for three[3] years.

ANNEXURE 2

HOBARK AND AFFILIATES Data Protection Impact Assessment (DPIA) Policy

Introduction:

This Data Protection Impact Assessment (DPIA) Policy outlines Hobark and Affiliates' approach to assessing the risks to data subjects' rights and freedoms arising from our data processing operations. This policy adheres to the principles and requirements of the Nigeria Data Protection Act (NDPA) 2023 and the General Data Protection Regulation (GDPR) 2016/679.

A. Description of Data Processing Operations:

Hobark and Affiliates engage in various data processing activities, including:

- **Customer data:** Collecting and processing customer information for account creation, order fulfillment, support services, and marketing purposes.
- **Employee data:** Managing employee records for payroll, benefits, performance reviews, and training purposes.
- **Website analytics:** Tracking website traffic and user behavior to improve our online services.
- **Third-party data:** Obtaining and processing data from partners and vendors for targeted advertising, market research, and fraud prevention.

B. Purposes of the Processing:

We process data for specific and legitimate purposes, such as:

- Fulfilling contractual obligations: Delivering products and services to our customers.
- Managing employee relationships: Recruiting, onboarding, and administering employee affairs.
- Enhancing customer experience: Providing personalized recommendations, offers, and support.
- Improving website functionality: Understanding user behavior and optimizing website performance.
- Complying with legal requirements: Fulfilling financial, tax, and regulatory obligations.

C. Legitimate Interest Pursued by Hobark and its Affiliates:

In certain cases, we may process data based on our legitimate interests, such as:

- Sending targeted marketing communications based on user preferences.
- Conducting market research to improve our products and services.

- Preventing fraud and protecting our business assets.

We carefully balance our legitimate interests with the privacy rights of data subjects to ensure a fair and proportional approach.

D. Necessity and Proportionality of Processing Operations:

We undertake regular reviews to ensure that our data processing activities are:

- **Necessary:** Data collection is limited to what is essential for achieving the intended purposes.
- **Proportional:** The amount of data collected, the processing methods used, and the retention period are all minimized to avoid unnecessary intrusions on privacy.

E. Assessment of Risks to Data Subjects:

We conduct thorough DPIA assessments to identify, analyze, and evaluate the potential risks to data subjects' rights and freedoms due to our data processing activities. These risks may include:

- Unauthorized access or disclosure of personal data.
- Unlawful or unfair data processing practices.
- Lack of transparency and control over data use.
- Adverse impacts on individuals' rights and freedoms (e.g., profiling, discrimination).

F. Risk Mitigation Measures:

Based on the identified risks, we implement appropriate technical and organizational measures to mitigate them. These measures may include:

- Data minimization: Collecting and storing only the minimum necessary data.
- Pseudonymization and anonymization: Reducing the identifiability of data.
- Encryption: Protecting data at rest and in transit.
- Access controls: Limiting access to data to authorized personnel.
- Data breach notification: Informing data subjects of any unauthorized access to their data.
- Regular reviews and updates: Continuously monitoring and improving our data protection practices.

Conclusion

Hobark and Affiliates take their data protection responsibilities seriously and are committed to protecting the rights and freedoms of data subjects. This DPIA Policy outlines our approach to assessing and mitigating risks associated with our data processing activities. We regularly review and update this policy to reflect changes in our operations, technology, and regulatory landscape.



ANNEXURE 3

HOBARK INTERNATIONAL LIMITED AND AFFILIATES - DATA BREACH INCIDENT REPORTING FORM

A

Purpose: This form serves to standardize the reporting of data breaches within Hobark International Limited and its affiliates. Please complete all sections accurately and promptly to facilitate a comprehensive investigation and response.

NAME	
DEPARTMENT	
AFFILIATE [If applicable]	
PHONE NUMBER	
DATE	

B

Incident Summary (Briefly describe the nature of the data breach).	
Incident Date and Time: (Provide the specific date and time when the incident occurred)	
Date of Initial Incident: (Date (if known))	
Potential Impact (Describe the potential risks and consequences of the data breach, including: Reputational damage Regulatory compliance issues Financial losses Legal consequences)	

C

Affected Systems and Data (List the systems, networks, or platforms involved in the breach).	
Type of Data Compromised: (Specify the categories of data compromised (e.g., personal information, financial data, etc.)	
Extent of the Breach (Number of Individuals/Accounts Affected)	

D

Geographical Scope (Specify the geographical locations affected by the breach, if applicable.)	
Response and Mitigation (Outline the immediate actions taken to contain the breach and mitigate potential damage e.g. Disabling affected systems Resetting user credentials Isolating compromised data Securing backups)	
Regulatory Notifications (Specify if regulatory authorities have been or will be notified and provide details).	
Law Enforcement Notifications (Indicate whether law enforcement has been or will be notified and provide details).	
Supporting Documents (Attach any relevant documents, logs, or evidence related to the incident)	

Note: This form is intended to guide the reporting process and should be submitted promptly upon the discovery of a data breach. Ensure that all relevant details are provided to facilitate a thorough



investigation and response.