1.0 WEBSITE PRIVACY NOTICE

This Privacy Notice provides information on how Berger Paints Nigeria Plc ("Berger Paints", "We", "Us" or "Our") collects and processes Users' ("You", "Your") personal data when you visit our website and other related platforms ("Site"). It sets out what we do with your personal data and how we keep it secure, and explains the rights that you have in relation to your personal data.

1.1 This Privacy Notice explains:

- how we collect, use, disclose, store, and protect your personal data;
- the lawful bases for processing your data;
- your rights under the Nigeria Data Protection Act, 2023 (NDPA) and the General Application and Implementation Directive, 2025 (GAID); and
- how you may exercise those rights.

1.2 Personal Data We Collect

We may collect and process the following categories of personal and non-personal data:
Personal Data You Provide Directly

- Contact details (full name, phone number, email address);
- Demographic information (date of birth, gender);
- Account and registration details (username, password, authentication data);
- Payment and billing information (where applicable);
- Marketing and communication preferences.

Automatically Collected Information

- IP address and device identifiers;
- Browsing activity, search history, pages viewed, downloads, and purchases;
- Cookies and similar tracking technologies :

1.3. Methods of Data Collection

We collect personal data through the following channels:

a. Direct Interaction

- Website forms, registrations, surveys, customer service communications;
- Emails, phone calls, and online correspondence.

b. Digital Platforms and Online platforms

- Website (cookies, login details, browsing behaviour)
- Social media platforms.

c. Automated Technologies

- Cookies, analytics tools, server logs, and system monitoring.

d. Transactions

- Online purchases, subscriptions, loyalty and promotional programs.

e. Monitoring and Security

- Website usage tracking and, where applicable, CCTV systems.

1.4. Purpose and Legal Basis for Processing

We process your personal data only were permitted by law and for the following purposes:

a. Consent

- Marketing communications and newsletters;
- Use of cookies and personalization tools.

You may withdraw your consent at any time.

b. Performance of a Contract

- Account creation and management;
- Order processing and service delivery;
- Customer support and relationship management.

c. Legal and Regulatory Compliance

- Record-keeping, tax, and audit obligations;
- Compliance with lawful requests from regulators and authorities.

d. Legitimate Interests

- Improving our website functionalities, products, and services;
- Fraud prevention, cybersecurity, and risk management;
- Analytics and service enhancement.

e. Vital Interests

- Protecting the safety or life of individuals in emergency situations.

f. Public Interest

- Where processing is required for public or regulatory purposes.

1.5. Disclosure of Personal Data

We may share your personal data with:

- Service providers and vendors who support our operations;

- Payment processors and marketing partners;
- Regulatory authorities, law enforcement agencies, and courts where required by law;
- Professional advisers and auditors;
- Successor entities in the event of a merger, acquisition, or restructuring.

All third-party processing is governed by appropriate contractual and security safeguards.

1.6. Cookies and Tracking Technologies

We use cookies to enhance your browsing experience, analyse website performance, and personalize content.

For full details on:

- Types of cookies we use,
- Their purposes, and
- How to manage your preferences,

Please review our Cookies Policy available on our website.

1.7. International Data Transfers

Where personal data is transferred outside Nigeria, Berger Paints ensures:

- Compliance with Sections 41–42 of the NDPA and GAID;
- Implementation of appropriate safeguards, including Data Processing Agreements;
- Informed consent where transfers are made to countries without adequate data protection regimes.

1.8. Data Security and Retention

We implement appropriate technical, organizational, and physical safeguards, including:

- encryption, access controls, firewalls, and secure servers;
- role-based access and confidentiality obligations.

Personal data is retained:

- only for as long as necessary to fulfil its purpose; and
- in accordance with legal, regulatory, and statutory requirements.

Where no retention period applies, data is deleted or anonymized within six (6) months after purpose completion, unless otherwise permitted by law.

1.9. Your Rights as a Data Subject

You shall have all such rights as afforded under Part VI of the NDPA. Specifically, you have the right to:

- Right to withdraw consent in relation to the processing of their personal data;
- Right to be informed regarding their personal data;

- Right to request and access any personal data collected and stored by Berger Paints;
- Right to request the deletion of their data;
- Right to be informed about appropriate safeguards in place where data is transferred abroad;
- Right to confirm the recipients or categories of recipient to whom the personal data have been or will be disclosed,
- Right to request rectification or restriction of personal data which is stored by Berger Paints;
- Right to request the transmission of data from Berger Paints to a third party (right to the portability of data);
- Right to object to automated decision-making and processing;
- Right to object to direct marketing;
- Right to request the processing of their information; and
- Right to lodge a complaint to the Nigeria Data Protection Commission (NDPC).

Contact & Communication

If you require additional information about this Notice or wish to contact our Data Protection Officer, please direct your correspondence to **"The Data Protection Officer"** at Berger Paints Nigeria Plc, Plot 102, Oba Akrab Avenue, Ikeja, Lagos, Nigeria, or send an email to dpo@bergerpaintnig.com