

DATA PROTECTION ORGANIZATIONAL STRUCTURE

1. Document Scope and Purpose

In line with Ringardas Nigeria Limited's (hereinafter referred to as "Ringardas" or the "Company") commitment to the protection of personal data as well as compliance with the relevant legislative and regulatory framework on the protection of personal data, in particular the Nigerian Data Protection Regulation, 2019 (NDPR), this document outlines the privacy organizational structure of Ringardas in order to define the roles and responsibilities pertaining to personal data privacy and protection.

In order to ensure effective implementation and continuous improvement of privacy governance within the organization, all relevant parties are expected to understand and comply with the responsibilities ascribed to them in this document.

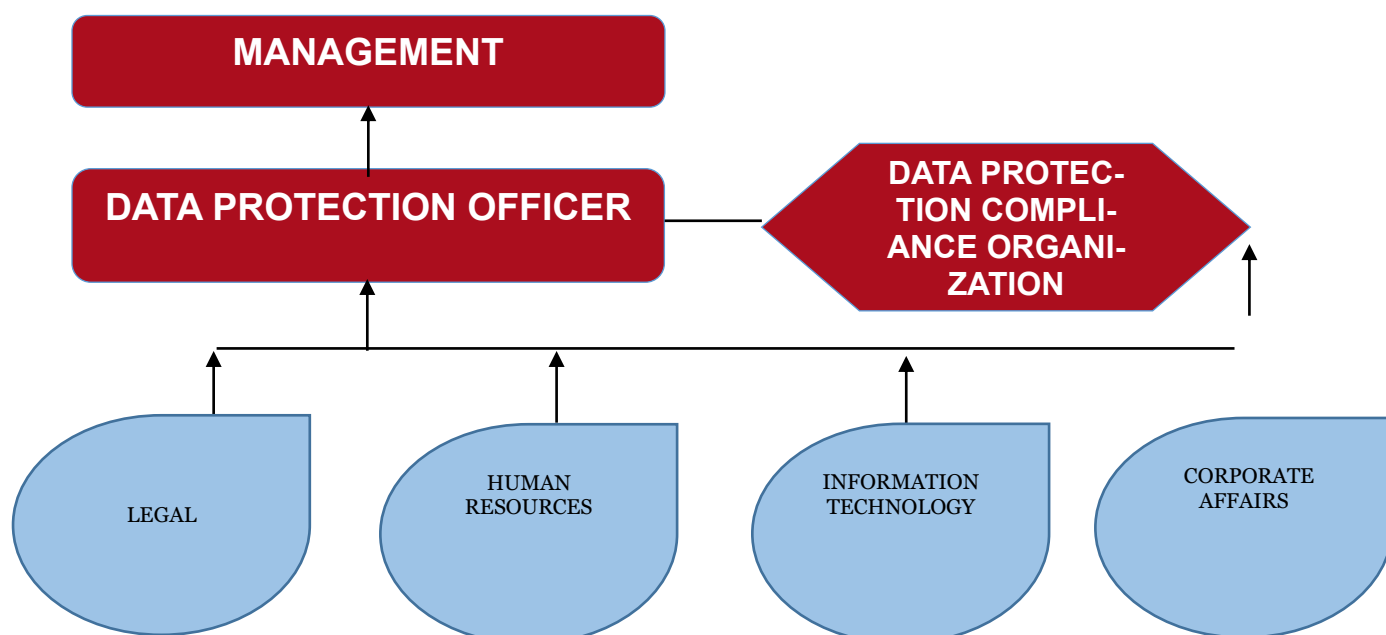
2. Ringardas Data Protection Organizational Structure Organogram

To guarantee privacy of data subjects and ensure the protection of personal data collected or processed by Ringardas, Ringardas relies on the full cooperation and coordination of the business units within the Company.

At the top of the Company's organizational structure is the Management of the Company comprising senior management personnel and executives (hereinafter referred to as the "Management"). This is followed by the Data Protection Officer (DPO) who would report directly to the Management. The DPO will be supported by a licensed Data Protection Compliance Organization (DPCO) appointed by the Company.

To assist the DPO in his/her duties, Data Champions would be appointed within the various business units. The Data Champions will work directly with the DPO for the implementation of the data privacy framework within the Company.

Diagrammatic Representation of Ringardas' Data Protection Organizational Structure



3. Data Privacy Roles and Responsibilities

3.1 Data Protection Officer (DPO)

The Data Protection Officer has the responsibility of acting as a central authority for the implementation of Ringardas' privacy program and is responsible for the protection of the personal data within the organization.

The main responsibilities of the DPO include, but are not limited to:

- Organize, implement, monitor and update the data protection strategy and the data privacy framework of the Company.
- Oversee, supervise and guide the actions of Data Champions in each business unit.
- Liaise with the appointed Data Protection Compliance Organization (DPCO) with respect to any issue regarding personal data privacy and protection.
- Liaise with the Data Champions to ensure compliance with the data privacy framework within the Company.
- Report to Management about the data protection compliance level of each business unit, as well as highlight any perceived or potential risks in order to mitigate such risks.
- Monitor and coordinate the actions of each data privacy champion during the personal data breach procedure in case of a related incident.
- Approve any strategic actions and/or projects that need to be implemented in the context of the data privacy framework.
- Suggest strategic actions to strengthen the level of the protection of personal data of the Group and to reduce any identified risks.
- Facilitate privacy awareness training for employees.
- With the support of the DPCO, liaise with the relevant government agencies and supervisory authorities during data privacy audits.
- With the support of the DPCO and the Legal team, monitor the laws and regulations that apply to the Company concerning the protection of personal data.
- Handle and maintain register of processing activities (ROPA), register of grievances and Data Subjects requests related to data subject's personal data.
- Ensure that a data privacy impact assessment is conducted in accordance with the provisions of the NDPR and monitor the action plans to mitigate any identified risks, as well as notify the Management of any high risks that have been identified by the data privacy impact assessment.

3.2 Data Champion

Each Data Champion is responsible for the protection of the personal data within their respective business units.

The main responsibilities of the Data Champions include but are not limited to:

- Implement the data privacy framework in their respective units.

- Contribute in the design and implementation of individual policies, procedures, and guidelines if necessary, customized for the respective business units.
- Report to the Data Protection Officer on all issues pertaining to data privacy and personal data protection.
- Communicate with the DPO on behalf of the business unit for clarifications and queries on data protection.
- Ensure that data collected is appropriate, relevant and limited to what is necessary for the purpose for which it is processed and manage consents which are initially received or revoked by data subjects for processing and retaining relevant evidence.
- Perform a data privacy impact assessment where necessary and send the results of such assessments to the DPO for further evaluation.
- Notify the DPO of incidents of personal data breaches within the business unit based on relevant procedures and instruction.

3.3 Management

The Management is responsible for defining the general principles, vetting the strategy for the protection of personal data and making the ultimate decisions on matters concerning the compliance of the Company's personal data protection framework.

The main responsibilities of the Management include, but are not limited to:

- Scrutinize and approve the personal data protection framework and provide the needed administrative mechanisms for its implementation within the Company.
- Define the framework within which all processing activities relating to the protection of personal data are carried out.
- Track the overall level of personal data protection, ascertain the maximum acceptable level of risk and take the final decision on necessary and appropriate administrative and/or technological protection mechanisms.
- Facilitate initiatives and efforts pertaining to the protection of personal data within the company.
- Ensure that the DPO fulfills his/her duties in an independent manner.
- Ensure the DPO has free and unhindered access to enable the DPO carry out his or her responsibilities as stated herein.

General Information

Title	Data Protection Organizational Structure
Status	Mandatory
Issuing Department	
Distribution/Target Audience	All employees, including contracted staff of Ringardas Nigeria Limited, agents/merchants of Ringardas Nigeria Limited and the general public
Approver	Management of Ringardas Nigeria Limited
Effective Date	April 2021
Version	1.0

Version Control

Version	Last Updated	Reason for Amendment