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### DATA PROTECTION AND PRIVACY POLICY

#### Purpose

The purpose of this Data Protection and Privacy Policy is to outline 17 ASUS Resources Ltd.'s commitment to protecting the privacy and security of personal data. This policy ensures compliance with applicable data protection laws and regulations, including the Nigerian Data Protection Regulation (NDPR) and other relevant legislation.

#### Scope

This policy applies to all employees, contractors, vendors, and business partners of 17 ASUS Resources Ltd. who handle personal data in the course of their duties. It covers all forms of personal data collected, processed, and stored by the company.

#### **Core Principles**

- 1. Data Collection
  - **Purpose Limitation:** Personal data will be collected only for specific, legitimate purposes and will not be used for any other purposes without the individual's consent.
  - **Data Minimization:** Only the minimum amount of personal data necessary to achieve the intended purpose will be collected.

#### 2. Data Processing

- **Lawful Processing:** Personal data will be processed in a lawful, fair, and transparent manner. We will obtain explicit consent from individuals where required.
- **Accuracy:** We will ensure that personal data is accurate, complete, and up-to-date. Individuals will be given the opportunity to update or correct their data.

## 3. Data Security

- **Protection Measures:** We will implement appropriate technical and organizational measures to protect personal data against unauthorized access, disclosure, alteration, and destruction.
- **Access Control:** Access to personal data will be restricted to authorized personnel only, based on the principle of least privilege.

#### 4. Data Retention

• **Retention Period:** Personal data will be retained only for as long as necessary to fulfill the purposes for which it was collected or as required by law. Once the retention period expires, data will be securely deleted or anonymized.

#### 5. Data Sharing

- **Third-Party Disclosures:** Personal data will not be shared with third parties without the individual's consent, except where required by law or for the performance of contractual obligations.
- **Third-Party Agreements:** We will ensure that third parties with whom personal data is shared are bound by appropriate data protection agreements.

## 6. Data Subject Rights

- **Access and Correction:** Individuals have the right to access their personal data and request corrections or deletions where applicable.
- **Complaints:** Individuals may lodge complaints regarding data protection practices with the relevant data protection authority.

# Implementation

- **Responsibility:** The Data Protection Officer (DPO) is responsible for overseeing compliance with this policy and ensuring that data protection practices are implemented effectively.
- **Training:** All employees will receive training on data protection and privacy to ensure they understand their responsibilities.
- **Monitoring:** Regular audits will be conducted to assess compliance with this policy and identify areas for improvement.

## Conclusion

17 ASUS Resources Ltd. is committed to safeguarding the privacy and security of personal data. Through this Data Protection and Privacy Policy, we ensure that personal data is handled with the highest standards of protection and respect for individual privacy.

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**Zuberu Jimoh** Managing Director