

PRIVACY POLICY

1. Introduction

This Privacy Policy applies to the website(s) and mobile applications (together, the "Sites") provided by Deli-Frost Caterers Nigeria Limited, a company incorporated in Nigeria, and registered office at 20, North Avenue, Apapa, Lagos State, Nigeria, and/or the other Products of Deli-Frost Caterers Nigeria Limited ("Deli-Frost", "we", "us") who act as data controllers with respect to the personal data you share with Deli-Frost Caterers Nigeria Limited under this Policy.

Deli-Frost Caterers Nigeria Limited knows that your privacy is important to you and takes user privacy very seriously. We are committed to protecting your personal data (i.e. any information you provide to us from which you can be identified) in accordance with this Privacy Policy and in compliance with the Nigeria Data Protection Regulation (NDPR) 2019.

Deli-Frost Caterers Nigeria Limited reserves the right, at its sole discretion, to alter and update this Privacy Policy from time to time. We, therefore, invite you to review the current version of the Privacy Policy each time you return to our Sites.

2. What Information we Hold About You

By "information" we mean all of the personal data about you that we collect, use, share, and store. The information we hold will vary according to the account and relationship you have with us.

Deli-Frost Caterers Nigeria Limited may need to collect information about you and your computer to allow you to use some of our services. These personal information may include:

- **Identity data:** First name, middle name, last name, marital status, title, date of birth, and gender.
- **Contact data:** billing address and telephone numbers, email address.
- **Technical data:** internet protocol (IP) address, your login data, browser type, and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access this website.
- **Profile data:** your username and password, your interests, preferences, feedback, and survey responses.
- **Usage data:** information about how you use our website, products and services.
- **Marketing and communications data:** your preferences in receiving marketing from us and our third parties and your communication preferences.

3. How We Collect Your Personal Information:

- **Direct Engagement:** when you register or log on to the website or when you choose to use an available Deli-Frost Caterers Nigeria Limited service via the website, mobile app, including when you fill out forms, transfer any policies into our agency, upload any documentation, send Deli-Frost Caterers Nigeria Limited any communication by email, phone or post, make an enquiry, or any other communication that Deli-Frost Caterers Nigeria Limited receives directly or indirectly from you.
- **When you browse the Deli-Frost Caterers Nigeria Limited website:** information relating to your browsing patterns and technical data about the equipment you are using to access the website is

automatically collected using cookies, server logs and other similar technologies. You can select your preference from the cookies settings on any of our websites

- Automatically: As you browse our websites certain information relating to your browsing patterns and technical data about the equipment you are using to access the website is automatically collected using cookies, server logs and other similar technologies. Please see our Cookie preference for further information.
- From third parties/public sources:
 - technical data may be obtained from the following parties:
 - analytics providers
 - advertising networks
 - search information providers
- We use CCTV on our premises to ensure the safety and security of our staff and customers.

4. Why we need the information and what we use it for

The Nigeria Data Protection Regulation requires us to have one or more of the following reasons for using your information:

1. **'Consent'** – in some cases we may obtain your consent to use information in a particular way or where the law requires consent to be obtained. **Using your information**
2. **'Contract performance'** – the information needed to deliver your account, product or service, e.g. we'll need to hold your transaction history to give you an account statement as our partner or distributor.
3. **'Legal obligation'** – we may be required by law to process your information.
4. **'Legitimate interest'** – we are allowed to use your information where, on balance, the benefits of us doing so are legitimate and not outweighed by your interests or legal rights e.g. we have an interest in knowing what our customers do and don't like so we can offer better products and services

These are the main ways we'll use your information (and the reasons for doing so):

- Manage your account and relationships with us
- Recover money that is owed to us
- Improve our services and computer systems
- Identify other products and services from us and our partners that you may find useful
- Manage and organize our business
- To manage relationships with third parties who introduce customers to us

5. How long we hold information

How long we keep your information for depends on the products and services we deliver to you.

We'll retain information for no longer than is necessary to manage your relationship with us and this will mean that we'll continue to hold some information for a period of time after our relationship has ended.

If you would like any further information about how long we hold your information, please contact our DPO by email at dpo@deli-frost.com or by post at Data Protection Officer, 20 North Avenue, Apapa, Lagos State.

6. Accuracy of Your Data

It is important that the personal data Deli-Frost Caterers Nigeria Limited holds about you is accurate and up-to-date. Please keep Deli-Frost Caterers Nigeria Limited informed if your personal data changes during your relationship with us. You can update your personal data or contact our Data Protection Officer when you want to exercise your right to Rectification.

7. Security of Your Data

In order to protect your personal data, Deli-Frost Caterers Nigeria Limited has appropriate organisational and technical security measures. These measures include storing data on a dedicated and secure server, restricting access to your personal data to certain employees, ensuring the Deli-Frost Caterers Nigeria Limited internal IT systems are suitably secure, and implementing procedures to deal with any suspected data breach.

In the unlikely event of a data breach, Deli-Frost Caterers Nigeria Limited will take steps to mitigate any loss or destruction of data and, if appropriate, will notify you and any applicable authority of such a breach.

8. Data Transfers and Sharing

Deli-Frost Caterers Nigeria Limited may need to pass your information to third party service providers which maintain, administer or develop the website on our behalf and the information will only be provided for such limited purposes and as detailed below. In addition, Deli-Frost Caterers Nigeria Limited may provide aggregate statistics about its customers, sales, traffic patterns and related website information to reputable third-parties, but these statistics will include no personally identifiable information.

As at the last update to this Privacy Policy, Deli-Frost Caterers Nigeria Limited does not share data with any Organisation(s) outside Nigeria.

9. Your Rights as a Data Subject

Your personal data is protected by legal rights as stated in the Nigeria Data Protection Regulation (NDPR) 2019. These rights include:

- **Right to rectification:** you have the right to require us to correct any inaccuracies in your data.
- **Right to erasure:** you have the right to require us to delete your data, subject to certain legal requirements.
- **Right to restriction of processing:** you have the right to require us to restrict the way in which we process your personal data. You may wish to restrict processing if, for example:
 - You contest the accuracy of the data and wish to have it corrected;
 - You object to processing but we are required to retain the data for reasons of public interest; or
 - as a customer, you do not wish to receive marketing communication.

- **Right to data portability:** you have the right to obtain from us easily and securely the personal data we hold on you for any purpose you see fit.
- **Right to object to processing:** you have the right to require us to stop processing your personal data should you wish the data to be retained but no longer processed. Please be aware that this may prevent us from continuing to provide services to you.
- **Right of access:** you have the right to request access to personal data that we may process about you.
- **Right to withdraw consent:** you have the right at any time to withdraw consent allowing us to process your personal data. This will not affect the legality of any processing prior to the date of such withdrawal.

If you would like to exercise any of the above rights, please:

- Put your request in writing and send it to us through your usual registered channel (e.g. registered e-mail);
- Specify the 'Right' you wish to exercise.

For more information or to exercise your data protection rights please, please contact our Data Protection Officer at: **dpo@deli-frost.com**

Deli-Frost Caterers Nigeria Limited will endeavor to process all subject access requests within 30 days and if any further extension is required, we will communicate same through existing consented channels – at no cost. However, please note that you may continue to receive existing communications for a transitional period whilst we update your preferences.

10. Job Applicants

If you apply for a job at Deli-Frost Caterers Nigeria Limited, you will be asked to submit information to Deli-Frost Caterers Nigeria Limited such as your name, contact details, information about your education and work history and any other background information that might be relevant for your application or that you choose to share with Deli-Frost Caterers Nigeria Limited. If you do not provide this information to us, we might not be able to process your application.

Deli-Frost Caterers Nigeria Limited will use this information to assess your application and candidacy for the position to which you have applied. Without limiting the generality of the foregoing, this may include:

- Evaluating your skills and experience in relation to the qualification required for the job to which you have applied; and
- Tracking feedback and interactions we have with you throughout the recruiting process. We may also use your information when analyzing our internal recruiting processes to determine:
 - Which recruit sources to focus on;
 - How to improve integration and training programs for new hires with different educational backgrounds and work experience; and
 - How to enhance our interview model to improve hiring quality.

The information you provide may also be used to communicate with you about Deli-Frost Caterers Nigeria Limited events and to send you publications that we think may be of interest to you.

We might share your personal data with other companies affiliated to Deli-Frost Caterers Nigeria Limited as well as with third parties such as recruitment service providers, background check providers and IT system providers. These Deli-Frost Caterers Nigeria Limited companies and third parties might be located in a different country than your country of residence.

We will keep your application data for up to 1 year. If you no longer wish for Deli-Frost Caterers Nigeria Limited to process your data or if you wish to exercise your rights, please contact dpo@deli-frost.com

11. Cookies

Cookies are small files placed on your computer's hard drive that enables our website to identify your computer as you view different pages. Cookies allow websites and applications to store your preferences in order to present contents, options or functions that are specific to you. Like most interactive websites, our website uses cookies to enable the tracking of your activity for the duration of a session. Our website uses only encrypted session cookies which are erased either after a predefined timeout period or once the user logs out of the platform and closes the browser. Session cookies do not collect information from the user's computer. They will typically store information in the form of a session identification that does not personally identify the user.

12. Updates to the Privacy Policy

We are constantly trying to improve our Websites and Product varieties, so we may need to change this Privacy Policy from time to time as well. We will alert you to material changes by, for example, placing a notice on our Websites and/or by sending you an email (if you have registered your e-mail details with us) when we are required to do so by applicable law. We reserve the right to update this Privacy Policy from time to time.

If you believe at any time that we have not handled your data in accordance with this Policy you should contact the Data Protection Officer. You may also contact the Nigeria Data Protection Bureau (NDPB) at: info@ndpb.gov.ng.

We have appointed a data protection officer (DPO) who is responsible for dealing with any such concerns, in addition to overseeing questions in relation to this Privacy Policy and handling requests in relation to the exercise of your rights. If you have any concerns or questions, please contact the Data Protection Officer using the details set out below.

13. Contact

Data Controller

Deli-Frost Caterers Nigeria Limited
20 North Avenue
Apapa, Lagos
info@deli-frost.com

If you have any questions, comments and requests regarding your privacy and rights, please let us know how we can help.

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