

Introduction

British American Tobacco Nigerian Foundation (hereinafter called "BATNF"/ "We"/"Our") treats personal information of applicants ("applicants"/"User"/ "You"/ "Your") of the Farmers for the Future Youth Challenge website (hereinafter called the "site"/"F4F site") as private and confidential.

This Privacy Policy ("Policy") describes what personal information BATNF collects, what BATNF does with it, how BATNF protects it and how BATNF maintains information collected from applicants on the F4F site.

This Policy applies to usage of the Site as well as information contained on the Site, particularly, information related to the Farmers for the Future Youth challenge organized by BATNF.

BATNF is committed to ensuring that Your privacy is protected. Should We ask You to provide certain information by which You can be identified when using this Website, You can be assured that it will only be used in accordance with this Policy

What personal data we collect and why we collect it

Personal identification information – We collect and use information about You to administer Our business. Information collected shall include:

- Your contact information such as name, contact address, email addresses, gender, telephone numbers and details of next of kin;
- Demographic information;
- Occupation, Career history, professional background and other CV related information;
- International and National passport, driving license or any other form of proof of identification;
- Transactional data, including financial details, your photograph;
- And any other information We may deem necessary and which may be determined by extant Nigerian laws and regulations.

We may collect personal identification information from you in a variety of ways, including, but not limited to when you visit our Site, register on the Site, subscribe to Our newsletter, respond to a survey, or fill out a form, and use connected features or resources made available on our Site.

Non-personal identification information – This is information received whenever You interact with Our Site. Non-personal identification information may include:

- Unique IDs such as your mobile device identifier or cookie ID on your browser.
- IP address and information that may be derived from IP address, such as geographic location.
- Information about a device you use, such as browser, device type, operating system, and the internet service providers utilized.
- Other information relevant to customer surveys and/or offers.

Why we collect your personal information

All personal information which we collect and process is justified by lawful processing on the basis that:

- You have given consent to the processing
- Processing is necessary for the performance of a contract to which you are a party or have take steps to enter into a contract;
- Processing is necessary for compliance with a legal and regulatory obligations to which we are subject;
- Processing is necessary in order to protect your vital interests or another natural person.
- Processing is necessary for the performance of a task carried out in the public interest.

What we do with the information we gather?

We require this information to understand your needs, and provide you with better service, particularly with regard to the following:

- Internal record keeping;
- To respond to your enquiries about BATNF;
- To improve our products and services;

- To improve customer service delivery;
- To send promotional emails about new products, special offers or other information which we think you may find interesting using the email address which you have provided;
- To contact you occasionally for market research purposes. We may contact you by email, phone, fax or mail;
- To deliver technical and functional management on our site;
- To provide specific services in accordance with an agreement you are entering, or have entered into with us;
- To manage the security of our sites, networks and systems;
- To comply with applicable laws and regulations and to operate our business;
- To run a promotion, contest, survey or other site features; and
- To improve our Site through feedback you provide on our products and services.

BATNF will not share with other parties information which you may provide when using the Site, except to the extent necessary to provide services to you, further to obtaining your consent.

How we collect personal information

We collect information about you and any other party whose details you provide to us when you:

- Complete online forms;
- Take part in surveys;
- Provide feedback on our products and services to improve our Site;
- Interact with us using our social media platforms;
- Download information such as publications or participate in any other interactive areas that appear on our website or portals;
- Contact us offline, for example by telephone, SMS, email, post or any other means of communication;
- Access and use any of our websites or portals from your devices (including mobile devices) and applications; and
- Share information with third parties that are entitled to share that information, but in each case as permitted by applicable laws.

Do We use Cookies?

We may use cookies to improve your browsing experience on our website. By browsing on our website, you consent to our use of cookies in accordance with our privacy policy.

About Cookies?

Cookies are a kind of short-term memory for the web. They are stored in your browser and enable a site to 'remember' little bits of information between pages or visits. Cookies can be used by web servers to identify and track users as they navigate different pages on a website, and to identify users returning to a website. Cookies may be either "persistent" cookies or "session" cookies. A persistent cookie consists of a text file sent by a web server to a web browser, which will be stored by the browser and will remain valid until its set expiry date (unless deleted by the user before the expiry date). A session cookie, on the other hand, will expire at the end of the user session, when the web browser is closed.

Our Website cookies

We use both session cookies (which expire once you close your web browser) and persistent cookies (which stay on Your device until you delete them). We need the cookies to enable the technical performance of Our websites and allow us to 'remember' the choices you make and your preferences (Functionality) and to allow us collect certain information about how you navigate the Sites (Performance/Analytical). By this, we are able to understand which parts of Our websites are interesting to You and which are not, as well as what We can do to improve them.

How We Use Cookies

Cookies do not contain any information that personally identifies You, but personal information that We store about You may be linked, by us, to the information stored in and obtained from cookies. The cookies used on Our website include those which are strictly necessary for access and navigation, cookies that track usage (performance cookies) and those used to remember your choices (functionality cookies). We may use the information We obtain from Your use of our cookies for the following purposes:

- To provide you with a better website experience by enabling us to monitor which pages You find useful and which you do not;

- To recognise Your computer and track you when You visit Our website;
- To retain investors' email addresses and passwords when they login to Our investment centre; and
- To analyse the use of Our website – such as how many people visit us each day.

Third-party Cookies

Our website uses cookies provided by trusted third-party such as Google Analytics, which is one of the most widespread and trusted analytics solutions on the web. This helps us to understand how You use the site and ways that We can improve Your experience.

Accepting, Declining and Disabling Cookies

You can choose to accept or decline cookies. Most web browsers automatically accept cookies, but You can usually modify your browser setting to decline cookies if you prefer. However, this may prevent you from taking full advantage of the website. You can also disable cookies if You wish. However, this will affect the functionality of Our website and many other websites that You visit. Disabling cookies will usually result in also disabling certain functionality and features of this site. Therefore, it is recommended that you do not disable cookies.

Links to other websites

Our Site may contain links to other websites of interest. However, once You have used these links to leave Our Site, You should note that We do not have any control over such websites. Therefore, We cannot be responsible for the protection and privacy of any information which You provide whilst visiting such websites and such websites are not governed by this Privacy Policy. You should exercise caution and review the privacy statement(s) applicable to the websites.

Controlling your personal information

You may choose to restrict the collection or use of your personal information in the following ways:

- Whenever You are asked to fill in a form on the Site, the privacy policy link will be available. You can decide not to fill the form if you do not accept the terms of the policy;
- If You have previously agreed to us using Your personal information for direct marketing purposes, You may change Your mind at any time by emailing us at BATN_Foundation@bat.com.

We will not sell, distribute or lease Your personal information to third parties unless we have Your permission or are required by law to do so. We may use Your personal information to send You promotional information about third parties which We think You may find interesting subject to your written permission to do so.

How we protect your information

We are committed to ensuring that Your information is secure. In order to prevent unauthorised access or disclosure, We have put in place reasonable physical, electronic and managerial procedures to safeguard and secure the information We collect online.

In particular, We adopt appropriate data collection, storage and processing practices and security measures to protect against unauthorized access, alteration, disclosure or destruction of Your personal transaction information and data stored on our Site.

Sensitive and private data exchange between the Site and its Users happens over a secured communication channel and is encrypted and protected. Transactions are also handled over a secure payment gateway. Also, BATNF has implemented appropriate technical, physical and organisational measures designed to protect personal information against accidental or unlawful destruction, accidental loss, damage, alteration, unauthorised disclosure or access, as well as all other forms of unlawful processing.

Retention of your personal information

We maintain personal information not longer than we need to use it in accordance with the BATNF's Data Retention Policy. In some circumstances, we may retain your personal information for longer periods if it is in accordance with regulatory, legal, tax or accounting obligations. BATNF has an established

retention procedure it applies to records and information collected and stored. In all cases, where your information is no longer required or you request for deletion, we will ensure it is disposed of in a secure manner.

Sharing your personal information

We do not sell, trade, or rent Users personal identification information to others. We may share generic aggregated demographic information not linked to any personal identification information regarding visitors and users with our business partners, trusted affiliates and advertisers for the purposes outlined above. We will not disclose Your personal information to anyone outside BATNF without Your consent to do so, unless one of the following circumstances applies:

1. **With your consent:**

We will share personal information with companies, organizations or individuals outside of BATNF when We have your consent to do so. We shall obtain your consent before sharing of any sensitive personal information

2. **For external processing**

We provide personal information to our affiliates or other trusted businesses or persons to process it for us, based on our instructions and in compliance with our Privacy Policy and any other appropriate confidentiality and security measures.

3. **For legal reasons**

We will share personal information with companies, organizations, or individuals outside of BATNF if we have a good-faith belief that access, use, preservation, or disclosure of the information is reasonably necessary.

- Meet any applicable law, regulation, such as the Nigeria Data Protection Regulation (NDPR), legal process, or enforceable governmental request.
- Detect, prevent, or otherwise address fraud, security, or technical issues.

protect against harm to the rights, property, or safety of BATNF, our Users, or the public as required or permitted by law.

Your acceptance of these terms

By using this Site, You signify Your acceptance of this policy. If You do not agree to this policy, please do not use Our Site. Your continued use of the Site following the posting of changes to this policy will be deemed Your acceptance of those changes.

Accessing and updating your personal information

Whenever You use Our services, We aim to provide You with access to Your personal information. If that information is wrong, We strive to give You ways to update it quickly or to delete it – unless We have to keep that information for legitimate business or legal purposes. When updating Your personal information, We may ask You to verify Your identity before We can act on Your request.

We shall, at your request, can confirm what information We hold about You and how such information is processed. The following information are available upon Your request.

- Contact details of the Data Protection Officer, where applicable;
- The purpose of the processing as well as the legal basis for processing;
- The categories of personal data collected, stored and processed;
- Recipient(s) or categories of recipients that the data is/will be disclosed to;
- Information about how We ensure transfer of personal data to a third party or international organisation is done securely. The Attorney General of the Federation will approve sending personal data to some countries because they meet a minimum standard of data protection. In other cases, We will ensure there are specific measures in place to secure your information;
- How long the data will be stored;
- Details of Your rights to correct, erase, restrict or object to such processing;
- Information about Your right to withdraw consent at any time;
- How to lodge a complaint with the supervisory authority, National Information Technology Development Agency (NITDA);
- Whether the provision of personal data is a statutory or contractual requirement, or a requirement necessary to enter into a contract, as well

as whether you are obliged to provide the personal data and the possible consequences of failing to provide such data;

- The source of personal data if it was not collected directly from you; and
- Any details and information of automated decision making, such as profiling, and any meaningful information about the logic involved, as well as the significance and expected consequences of such processing.

Your Rights as a Data Subject

At any point while we are in possession of or processing your personal data, You, the data subject, have the following rights:

- Right of Access – You have the right to request a copy of the information that We hold about you
- Right of Rectification – You have a right to correct data that We hold about You that is inaccurate or incomplete
- Right to be Erased/Forgotten – In certain circumstances You can ask for the data We hold about You to be erased from our records
- Right to Restriction of Processing – Where certain conditions apply to have a right to restrict the processing
- Right of Portability – You have the right to have the data We hold about you transferred to another organisation (to be reused for Your own purposes)
- Right to Object – You have the right to object to certain types of processing such as direct marketing
- Right to Object to automated processing, including profiling – You also have the right to be subject to the legal effects of automated processing or profiling
- Right to Withdraw – You have the right to withdraw Your consent at any time

Dispute Resolution or Filing A Complaint

If you have any complaints regarding our compliance with this Privacy Policy, please contact our Data Protection Officer. We will investigate and attempt to resolve complaints and disputes regarding use and disclosure of personal information within thirty (30) days in accordance with this Privacy Policy and in accordance with applicable law and regulation.

Changes to this privacy policy

Our Privacy Policy may change from time to time. We will not reduce your rights under this Policy without your explicit consent. We will post any privacy policy changes on this page and, if the changes are significant, we will provide a more prominent notice (including, for certain services, email notification of privacy policy changes) or via a pop-up notice or statement of changes on our website)

You acknowledge and agree that it is Your responsibility to review this Policy periodically and become aware of modifications. This Privacy Notice or Policy was last updated on November 15, 2019. The most up-to-date version can be found on this website.

Compliance with the Regulators

This Privacy Policy is in line with the provisions of Nigeria Data Protection Regulation, 2019 (Regulation), a regulation which describes how organisations including the ARM Group must collect, handle and store personal information and applies regardless of whether data is stored electronically, on paper or on other materials.

Contact Us

Contact details of the Data Protection Officer: BATN_Foundation@bat.com