



**MRS OIL NIGERIA PLC
PRIVACY GOVERNANCE POLICY**

This Policy is issued pursuant to the Nigerian Data Protection Regulation, 2019 and International Best Practices on Data Protection.

Review Frequency This document is reviewed biennially.
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MRS Oil Nigeria Plc's Record of Change to the Privacy Governance Policy

MRS Oil Nigeria Plc. ("the Company") records planned updates under this section. The version number, author's name and date, approver's name and date, change type (i.e., high-level descriptor such as: 'Contact List Updates'), and a brief summary of the changes to the plan should be provided in the appropriate columns. For reviews that did not result in any updates, record 'No Updates' in the 'Summary of Changes' column.

Version	Author (Name, & Date)	Approver (Name, & Date)	Change type	Summary of Changes
1.0			Plan Creation	Created the Incident Response Plan

Contents

1. INTRODUCTION4

2. DEFINITIONS4

3. PRIVACY GOVERNANCE POLICY4

4. DATA INCIDENCE RESPONSE4

5. REVIEW OF POLICY5

1. INTRODUCTION

As one of the Major Marketers in the downstream sector of the Nigerian Oil and Gas Industry, MRS Oil Nigeria Plc ("the Company"), collects personal information of data subjects it relates with. In compliance with the Nigerian Data Protection Regulation (NDPR), the Company is committed to the protection of the data of its data subject(s) to prevent the occurrence of any breach. The Company has a cross-functional approach to privacy governance. The approach covers all areas of business operations of the Company, including but not limited to details of directors, employees, customers, vendors, agents and the data information of its business partners.

2. DEFINITIONS

- a. **Data Subject** means any person whose personal data is being collected, held and processed.
- b. **DPO** means Data Protection Officer;
- c. **NDPR** means Nigerian Data Protection Regulation;
- d. **The Company** means MRS Oil Nigeria Plc.

3. PRIVACY GOVERNANCE POLICY

The DPO reports to the Managing Director and s/he is responsible for the implementation of the Company's privacy policy and its compliance within the Company. The Board Nomination and Corporate Governance Committee and the Risk Strategy and Finance Planning Committee of the Board, assists with oversight and monitoring functions of the Company's privacy and data security framework and risks.

There is a robust and active cyber security program in place to protect and secure all information in our database. We have an effective access control and management system commensurate to the risk of the data collected, to ensure that access to data is given to authorized personnel on the basis of business needs.

There are designated and approved employees who collate and process data information of the Company's data subject and have direct access to the Company's database. The Company strictly enforces privacy safeguards through regular training of the designated employees on privacy and data protection requirements.

4. DATA INCIDENCE RESPONSE

We have a data incidence response team that investigates a breach once it is reported, to determine the root cause of the incidence and necessary steps to be taken in response to the incidence. The breach is reviewed in line with the NDPR and a decision is taken by the Management on how to notify the affected persons and regulators alike. Upon the conclusion of the investigation, the Company shall promptly notify the affected persons and provide necessary support as may be required, by advising the affected persons on steps that can be taken to reduce the risk of harm and any compromise.

5. REVIEW OF POLICY

This Policy shall be reviewed every two (2) years or as deemed necessary, in line with the applicable laws.

**Approved by the Board of Directors
On May 27, 2020**