



WELCOME

Dear job applicant, with this notice we would like to explain to you how and for which purposes we use your personal data in connection with your application and which rights and options you have in this respect.

1. WHO IS RESPONSIBLE FOR YOUR PERSONAL DATA?

Lafarge Africa PLC and its Subsidiaries (Lafarge), will be the primary responsible controller for your personal data (references in this Policy to Lafarge shall include AshakaCem Limited and any company for the time being a subsidiary of Lafarge Africa PLC). In addition, other Lafarge affiliates may control your personal data to the extent we are required or permitted by law or with your consent to share your personal data with them for the purposes described below.

2. FOR WHICH PURPOSES DO WE USE YOUR PERSONAL DATA?

We will process your personal data as required in connection with your application, in particular for the following purposes:

- *General HR and personnel administration*, Processing of your application, including review and analysis of your qualifications and skills and considering your suitability for the job opportunities for which you applied, communication with you, conducting assessment centers and any other evaluation means, expense reimbursement and organization of any travel required;
- *Organizational purposes*, including planning, controlling, budgeting, benchmarking and restructuring;
- *Security purposes*, including maintaining and protecting our property, ensuring integrity and security of and controlling access to our premises, facilities, IT and communication systems, platforms and secured websites and applications websites and other systems or facilities (including monitoring by camera or other means of surveillance), investigating, preventing and detecting security threats, fraud, theft or other criminal or malicious activities;
- *Legal documentation purposes*, to ensure compliance with legal documentation and document retention obligations (such as record keeping obligations);
- Organizational compliance, in particular monitoring and assessing compliance with our policies and standards;
- Regulatory compliance, ensuring compliance with our legal and regulatory obligations and requests anywhere in the world, including reporting to or being audited by national and international regulatory, enforcement or exchange bodies which may include conducting reference checks, background checks, public register checks, conflict checks, credit checks, criminal records checks (where applicable) and other due diligence as required under applicable law and regulations
- General compliance, ensuring compliance with legal compliance obligations, such as compliance screening or recording obligations (e.g. under antitrust laws, export laws, trade sanction and embargo laws, or to prevent white-collar or money laundering crimes), which may include checks of your contact or identity data against applicable sanctioned-party lists and contacting you to confirm your identity in case of a potential match or recording your interactions with third parties as may be relevant for antitrust purposes; and
- Disputes and enforcement of claims, including supporting us in dealing with and solving disputes, complying with orders of courts, authorities or other public bodies, enforcing our contractual agreements and to establish, exercise or defend legal claims.

Data Privacy Notice

Where you have given us your consent, we may also use your personal data for the following purposes:

Including you in our job applicant database, to provide you by email, telephone or other communication channels you permitted us to use with information about exciting job opportunities at Lafarge and to store and process and share with our Group affiliates any personal data you submitted with your applications for this purpose.

Sending you Lafarge information and updates, through updates by email about products and services, news, announcements and invitations to programs, customer surveys or other events from Lafarge, including from our affiliates (see above).

The legal bases for processing of your personal data is either necessary for the performance of your application, freelancing or other agreement with Lafarge, compliance with our legal obligations (e.g. to keep pension records or records for tax purposes), or Lafarge's legitimate interest related to business efficiency, resource allocation, fraud prevention or asset protection (including such legitimate interests of third party recipients that receive your personal data). Provided that such interests are not overridden by your fundamental rights and freedoms. In addition, the processing may be based on your informed consent where you have expressly given that to us.

3. WHICH PERSONAL DATA DO WE COLLECT?

Unless otherwise agreed with you, we will collect only personal data which are required in connection with your application for the above purposes. This includes any information you provide to us directly with your application and any information which is derived from such collected data or otherwise collected or generated in the course of your application process.

This typically includes the following categories of data:

- Personal details, such as name, address, date of birth, marital status, emergency contact details, country of residence, national insurance number, prior or expected salary, bank details, social security and tax related details;
- Professional details, such as your prior work contact details, position and career data, CV, details of your qualifications, relevant experience and skills;
- Identification documentation, such as copies of your passport, driving license, national or work ID card, or other documentation (which may include photographs submitted by you);
- Further application-related information, such as expense reimbursement data, assessment centers or other performance assessments, references, credit and background checks;
- Data relating to access to and use of our systems, facilities and premises which may include data generated through monitoring by camera, GPS, monitoring and logging of your use of our communication and IT systems and other means of surveillance;
- Data relating to or generated from compliance activities, including data from reference checks, background checks, public register checks, conflict checks, credit checks, criminal records checks. (where applicable) and other due diligence, recording or reporting as required under applicable law and regulations as well as from compliance investigations;
- Data relating to disputes and enforcement of claims, including data relating to or generated from proceedings, disputes, negotiations, statements, pleadings or other related communication or activities;
- Other personal data derived from or generated by pursuing the above Permitted Purposes

Special categories of Personal Data. Where required for the above Permitted Purposes and only where required or permitted by applicable law or where you have specifically given us your consent, we may ask for information about your health and disabilities (e.g. to comply with related statutory workplace security or insurance obligations), biometric data (e.g. for access control or security purposes) or data revealing racial, ethnic origin or religious beliefs (e.g. for diversity purpose).

4. HOW DO WE COLLECT PERSONAL DATA?

We will collect your personal data primarily directly from you when you interact with us in the course of your application, e.g. when you complete job applicant questionnaires, visit our intranet, our website or other communication or working platforms and when you communicate with us in relation to your application. In addition, we will generate personal data about you in the course of your application for the above Permitted Purposes (e.g. expense reimbursement, assessment centers and other performance reviews, recording and monitoring of your entrance and use of our premises, facilities and communication and IT systems).

5. HOW DO WE PROTECT YOUR PERSONAL DATA?

We maintain physical, electronic and procedural safeguards to protect your personal data from unauthorized access or intrusion. These safeguards include implementing specific technologies and procedures designed to protect your privacy, such as secure servers, firewalls and SSL encryption. We will at all times strictly comply with applicable laws and regulations regarding the confidentiality and security of personal data.

6. WITH WHOM WILL WE SHARE YOUR PERSONAL DATA?

We may share your personal data with:

Our affiliates within the Group worldwide if and to the extent required for the Permitted Purposes and legally permitted or where you have expressly given us your consent. In such cases, these entities will then use the Personal Data for the same purposes and under the same conditions as outlined in this Data Privacy Policy.

Third parties who process your personal data on their own behalf but in connection with a service provided to us or you on our behalf for the Permitted Purposes (such as background check providers or third parties from whom we request a reference).

Service providers (so called data processors) within or outside of the Group, domestically or abroad (e.g. shared service centers, payroll or other service providers, including cloud providers) instructed by to process personal data for the Permitted Purposes on our behalf and in accordance with our instructions only.

Lafarge will retain control over and will remain fully responsible for your personal data and will use appropriate safeguards as required by applicable law to ensure the integrity and security of your personal data when engaging such service providers.

Public or governmental bodies such as regulatory or enforcement authorities, attorneys or courts where we are required to do so by applicable law or regulation or at their request if legally permitted and necessary to comply with a legal obligation or for the establishment, exercise or defense of legal claims.

Otherwise, we will only disclose your personal data when you direct or give us permission, when we are required by applicable law or regulations or judicial or official request to do so, or when we suspect fraudulent or criminal activities

7. WHERE DO WE PROCESS YOUR PERSONAL DATA?

In the course of our business activities, and based on our binding corporate rules, standard contract clauses or your informed consent, we may transfer your personal data also to recipients in other countries ("third countries"), in which applicable laws do not offer the same level of data protection as the laws of your home country. When doing so we will comply with applicable data protection

requirements and take appropriate safeguards to ensure the security and integrity of your personal data.

8. YOUR DATA PROTECTION RIGHTS

Subject to certain legal conditions, you may request access to, rectification, erasure or restriction of processing of your personal data. You may also object to processing or request data portability. In particular, you have the right to request a copy of the personal data that we hold about you. If you make this request repeatedly, we may make an adequate charge for this.

For any of the above requests, please send a description of your personal data concerned stating your name, your job applicant ID number and your date of birth as proof of identity to the contact details below. We may require additional proof of identity to protect your personal data against unauthorized access. We will carefully consider your request and may discuss with you how it can best be fulfilled.

If you have given us your consent for the processing of your personal data, you can withdraw the consent at any time with future effect, i.e. the withdrawal of the consent does not affect the lawfulness of processing based on the consent before its withdrawal. In case consent is withdrawn, we may only further process the personal data where there is another legal ground for the processing.

If you have any concerns about how your personal data is handled by us or wish to raise a complaint on how we have handled your personal data, you can contact us via email at ng-m-dataprotection@lafarge.com to have the matter investigated and addressed.

If you are not satisfied with our response or believe we are processing your personal data not in accordance with the law you can complain to the Nigeria Data Protection Commission (NDPC) via <https://services.ndpc.gov.ng/breach/>.

9. ARE YOU REQUIRED TO PROVIDE PERSONAL DATA?

As a general principle, you will provide us with your personal data entirely voluntary. However, in certain circumstances we are required to collect certain personal data or in which Lafarge cannot take action without certain of your personal data, for example because this personal data is required to deduct taxes from your salary, carry out a legally required compliance screening or provide evidence of legally required trainings or qualifications. In these cases, if you do not provide us with your personal information, we may be unable to properly administer your application, assign certain tasks to you or permit you to participate in certain activities or services offered in connection with your application.

10. HOW LONG DO WE STORE PERSONAL DATA?

Your personal data will be deleted when it is no longer reasonably required for the Permitted Purposes or you withdraw your consent (where applicable) and we are not legally required or otherwise permitted to continue storing such data. We will in particular retain your personal data where required for Lafarge to assert or defend against legal claims until the end of the relevant retention period or until the claims in question have been settled. Application data for unsuccessful candidates is held for 6 months after the recruitment process is complete.

11. UPDATES OF THIS DATA PRIVACY INFORMATION

This Data Privacy Policy was last updated in December 2024. We reserve the right to update and change this Data Protection Notice from time to time in order to reflect and changes to the way in which we use your personal data or changing legal requirements. Any amended Data Privacy Policy will apply from the date it is posted on our intranet or otherwise made available to you.

12. HOW TO GET IN TOUCH WITH US

If you have any questions regarding your rights or if you have any specific requests relating to your personal data please contact your Recruiting team or our Data Protection Officers at ng-m-dataprotection@lafarge.com

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