

## **PRIVACY NOTICE**

### **1. Introduction**

Activity Events Limited ("the Company", "AEL", "We", "Us", or "Our") is an entertainment Company that is involved in organising promotional events, concerts and public performances, as well as similar entertainment events, including but not limited to its flagship event known as Activity Music Festival ("AMF").

This Privacy Notice ("**Notice**") governs your use of our website <https://activitymusicfestival.com/#hero> ("the **Website**") used to provide our services (referred to as the "**Services**"). We provide this Notice because you have a right to know what information we collect, why we collect it, how it is protected and used, and the circumstances under which it may be disclosed because your privacy is important to us.

### **2. Terms of Use**

You are required to comply with the provisions of our Terms of Use in relation to the information provided.

### **3. Your data that we process**

Personal data is any information about an individual that can be used to identify that person directly or indirectly. For example, while using the website, we may request personal information from you in order to contact or identify you, and some information may be collected automatically in order for our website to function properly. We also collect personal data from third-party sources or through your use of our services such as when you sign-up or register for any of our services. We obtain the following information:

- First and last name;
- E-mail address;
- Phone number;
- ATM card number, CVC code and expiration date;
- The IP address used to connect your device to the internet for identification purposes;
- Name of the internet service provider (ISP);
- Date and time of visit;
- Web pages visited, duration, and frequency of visits;
- Browsing Behaviour; and
- Device ID.

### **4. Children's data**

Our services are not typically directed at persons under the age of sixteen (16) and we request that they do not provide any personal information through our services.

### **5. Cookies**

Cookies are tools used to automatically collect information from you when you visit a website. We currently do not use cookies on our website.

## 6. Lawful bases for processing data

We are required to process your data under at least one of these lawful bases:

- **Legitimate interest:** Processing your data is necessary for our legitimate interests or the legitimate interests of a third party, provided your rights and interests do not outweigh those interests.
- **Consent:** You have given explicit consent for us to process your data for a specific purpose.
- **Contract:** If the data processing is necessary for a contract with us or because we have asked you to take specific steps before entering that contract.
- **Legal obligation:** If the processing of your data is necessary where there is a statutory obligation on us.

## 7. Purpose of Processing Your Data and the Lawful Bases

We collect your data:

Purpose of Processing	Lawful Bases
<ul style="list-style-type: none"> <li>▪ To administer our business</li> <li>▪ To help us to develop, improve, customise or restructure our services</li> <li>▪ To enforce our terms of service and any terms and conditions of any other agreements for our services.</li> </ul>	Legitimate interest, contract
<ul style="list-style-type: none"> <li>▪ To send marketing or promotional messages to you.</li> </ul>	Consent
<ul style="list-style-type: none"> <li>▪ To take statistical data and analytics for our use internally</li> <li>▪ To send you service-related messages</li> <li>▪ To analyse Site usage and provide, maintain and improve the content and functionality of the Site.</li> </ul>	Legitimate interest
<ul style="list-style-type: none"> <li>▪ To secure your data and prevent fraud.</li> </ul>	Legitimate interest, legal obligation
<ul style="list-style-type: none"> <li>▪ To communicate with you and for customer support.</li> <li>▪ To address your inquiries and complete your transactions.</li> <li>▪ To enable an easy and effective payment system.</li> </ul>	Contract

<ul style="list-style-type: none"> <li>To inform you whenever there are changes to our terms of business or services.</li> </ul>	Legal obligation, contract
<ul style="list-style-type: none"> <li>To fulfil our Know Your Customer (KYC) obligation.</li> <li>To interact with regulatory authorities or other public authorities concerning you.</li> </ul>	Legal obligation

## 8. Your Rights as a Data Subject

The law vests you with certain rights as a data subject. They include the right to:

- access personal data we hold about you by requesting a copy of the personal data we hold about you;
- rectify such information where you believe it to be inaccurate;
- restrict the processing of your data in certain circumstances;
- object to the processing of your data where we intend to process such data for marketing purposes;
- where feasible, receive all personal data you have provided to us—in a structured, commonly used, and machine-readable format—and transmit the information to another data controller;
- request the erasure of your data (also known as the right to be forgotten);
- withdraw your consent to the processing of your data; and
- lodge a complaint with a relevant authority where you have reason to believe that we have violated the term(s) of this Privacy Notice. (You may complain or seek redress from us within 30 days from when you first detected the alleged violation).

You may seek to exercise any of the above rights at any time by sending us an email at [team@activityfestival.com](mailto:team@activityfestival.com)

The supervisory authority is the Nigerian Data Protection Bureau (NDPB), and a complaint can be sent via email to [info@ndpb.gov.ng](mailto:info@ndpb.gov.ng).

## 9. Who we share your data with

We share your data with the following third-parties:

Third Parties	Purpose of data sharing
Flutterwave	We use their service to process payments. Read Flutterwave's Privacy Notice <a href="#">here</a> .
Legal and Regulatory Authority	We may disclose your personal data if we believe it is reasonably necessary to comply with a law, regulation, order, subpoena, audit, or to

	protect the safety of any person, to address fraud, security or technical issues.
Service Providers	We will share your personal data with service providers to enable them to render services to us to provide services to you, including payment processing services providers or conduct data processing on our behalf, or for data verification, centralisation or logistics purposes.

Note that if you wish to prevent your device’s operating system from sharing your Personal Data with Activity Festival or with the third parties mentioned for profiling purposes, you can do so by setting up your device appropriately – namely, by changing the privacy settings on your device to disable/restrict any advertising tracking features. For more information on this, please see the following links:

- **iOS Devices:** <https://support.apple.com/en-us/HT202074>;
- **Android Devices:** <https://support.google.com/ads/answer/2662922?hl=en>

### **10. Retention of your data**

The data and any other information we collect from you will be stored for as long as necessary to fulfil the purposes described in this Notice.

However, we will also retain data subject to relevant provisions of applicable laws, resolve disputes, prevent fraud and abuse, and enforce our legal agreements and policies. In addition, we delete your data for targeted marketing purposes once you unsubscribe from our marketing communications.

Please note that your data may be retained for a more extended period, notwithstanding your request to remove your data, where there is a legal requirement to do so.

### **11. How your data is stored and secured**

We are very particular about preserving your privacy and protecting your data. We deploy reasonable and appropriate technical and organisational measures to keep your data safe. However, we cannot completely guarantee the security of any information you transmit via our website, as the internet is not an entirely secure place. Nevertheless, we are committed to doing our best to protect you.

We protect your data using physical, technical, and administrative security measures to reduce the risks of loss, misuse, unauthorised access, disclosure and alteration.

Where there is an actual or suspected data breach capable of causing harm to your rights and freedoms, we will notify you without undue delay and use our best effort to remedy the breach promptly.

### **12. International transfer of data**

To achieve the purposes described in this Notice, we may transfer your data to countries that do not offer adequate protection or are not considered to have good laws by the National Information Technology Development Agency (NITDA). Where personal data is to be transferred to a country outside Nigeria, we shall put supplementary measures to ensure adequate protection.

Our data transfers to countries without adequate protection are subject to the Nigeria Data Protection Regulation (NDPR) conditions. We will, therefore, only transfer Personal Data out of Nigeria on one of the following conditions:

- Your consent has been obtained;
- The transfer is necessary for the performance of a contract between Us and you or implementation of pre-contractual measures taken at your request;
- The transfer is necessary to conclude a contract between Us and the third party in your interest;
- The transfer is necessary for reason of public interest;
- The transfer is for the establishment, exercise or defence of legal claims; or
- The transfer is essential to protect your vital interests or other persons, where the data subject is physically or legally incapable of giving consent.

Please contact us to obtain relevant information regarding your data transfers to third countries (including the appropriate transfer mechanisms).

### **13. Marketing and communications**

We only send marketing communications to you with your consent. You may opt-out of our marketing or object to further processing by clicking on the 'unsubscribe' button at the bottom of the page.

### **14. Complaints**

If you are concerned about an alleged breach of data protection law or any other regulation by us, you can contact the Data Protection Officer (DPO) at [team@activityfestival.com](mailto:team@activityfestival.com). The DPO will investigate your complaint and provide information about how your complaint is handled.

Please be informed that you may complain to the relevant data protection authority if your complaints are not satisfactorily addressed.

### **15. Changes to this Notice**

We update our privacy notice from time to time. We will notify our users when we make a change, and visitors will know this by checking the last date of update on this page whenever they visit.

## **16. Contact Us**

If you have any questions relating to this Notice, your rights under this Notice, or are not satisfied with how we manage your personal data, kindly reach out to our Data Protection Officer or email us at [team@activitymusicfestival.com](mailto:team@activitymusicfestival.com).

**Effective October 1, 2022**