

PRIVACY POLICY

Effective Date: February 24, 2020

1 ABOUT EG&H Integrated Concepts Ltd

EG&H Integrated Concepts Ltd (EG&H) is licensed National Lottery Operator in Nigeria. The Company and is licensed and regulated by the National Lottery Regulatory Commission. The Company owns and Operates several lotto and lottery games under the Plentymillions™ brand.

This privacy policy will explain how our organization uses the personal data we collect from our customers and related partners when you use our website or subscribe to use any of our products and services/.

2 INTRODUCTION

EG&H conducts business in a responsible and sustainable manner and ensures customer information is securely collected, processed and stored based on business requirements. in furtherance to this and compliance with industry regulations, EG&H has made appropriate documentation, which includes a privacy policy. EG&H, therefore, provides notice about this policy, applicable procedures and identifies the purposes for which personal information is collected, used, processed, disclosed, retained and disposed of.

Throughout this Privacy Policy, we use the term "personal information or data" to describe information that can be associated with a specific person and can be used to identify that person. We do not consider personal information to include information that has been made anonymous so that it does not identify a specific user.

3 SCOPE AND CONSENT

As a Customer, you accept this Privacy Policy when you sign up for, access, or use our products, services, content, features, technologies or functions offered on our website and all related sites, applications, and services (collectively referred to as "EG&H Services").

This Privacy Policy is intended to govern the use of EG&H Services by users (including, without limitation those who use these EG&H Services in the daily course of their trade, practice or business) unless otherwise agreed through contract. Users reserve the right to exercise their data protection rights as listed under the Customer Data Protection Rights.

4 COLLECTION OF PERSONAL INFORMATION

We collect Personally Identifiable Information (PII), otherwise known as Personal Information or Personal Data. They include name, email address, phone number, contact address, limited financial information, location data, device data, etc.

5 HOW WE COLLECT PERSONAL INFORMATION

Customers' data is collected electronically and manually when they visit our website and register to use any of our services. This is collected electronically with exchanges between your system (Computer, Server, Mobile Device) or service provider's system and our system.

We collect Customers' data manually when they complete our product and services registration forms in registering to use any of our services. Similar data are also collected when customers or visitors' visit our physical locations for inquiries or business relationship.

We collect information from or about customers from other sources, such as through your contact with us, including our Customer Support interfaces – email, portal, phone calls, social media, and other communication channels; Customer support teams, Customer response to surveys, training programmes, Corporate Social Responsibility events, Promotional events, and interactions with members of EG&H or other companies (subject to their privacy policies and applicable law).

We may also obtain information about you from third parties such as our partner winnings payment banks and telco providers.

6 HOW WE USE COLLECTED INFORMATION

We collect personal information to provide users of our services with a secure, smooth, efficient, and customized experience. Furthermore, the information collected may also be used to provide EG&H Services and customer support; process transactions and send notices about your transactions; verify your identity, including during account creation and password reset processes; resolve disputes, pay prize winnings, and troubleshoot problems; manage risk, or to detect, prevent, and/or remediate fraud or other potentially prohibited or illegal activities; detect, prevent or remediate violations of policies or applicable user agreements.

We also collect personal information to improve Services by customizing your user experience; measure the performance of the EG&H Services and improve their content and layout; manage and protect our information technology infrastructure; provide targeted marketing and advertising, provide service update notices, and deliver promotional offers based on your communication preferences; contact you at any telephone number, by placing a voice call or through text (SMS) or email messaging; perform creditworthiness and solvency checks, and compare information for accuracy and verify it with third parties.

Additionally, we may contact you via electronic means to notify you regarding your account, to troubleshoot problems with your account, to resolve a dispute, to pay winnings or monies owed, to poll your opinions through surveys or questionnaires, or as otherwise necessary to service your account. Furthermore, we may contact you to offer coupons, discounts, and promotions, and inform you about EG&H Services.

Finally, we may contact you as necessary to enforce our policies, applicable law, or any agreement we may have with you. When contacting you via phone, to reach you as efficiently as possible we may use, and you consent to receive, auto dialed or prerecorded calls and text messages. Where applicable and permitted by law, you may decline to receive certain communications.

7 PROTECTION AND STORAGE OF PERSONAL INFORMATION

We store and process your personal information on our computers in Abuja, Nigeria and anywhere else where our Cloud Partner facilities are located. We protect your information using physical, technical, and administrative security measures to reduce the risks of loss, misuse, unauthorized access, disclosure, and alteration.

Some of the safeguards we use are firewalls and data encryption, physical access control and information access authorization controls. We have also taken additional measures by ensuring our system complies with industry information security standards.

8 MARKETING

We do not sell or rent your personal information to third parties for their marketing purposes without your explicit consent. We may combine customer's information with information collected from other companies and use it to improve and personalize EG&H Services, content, and advertising. We have also included an opportunity for customers that had initially subscribed to receiving notification or information about their activities in relation to the use of EG&H's service to unsubscribe or request to be removed from applicable databases.

9 SHARING PERSONAL INFORMATION WITH OTHER EG&H USERS

When transacting with others, we may provide those parties with information to complete the transaction, such as your name, account ID, contact details, billing address, or other information needed to promote the reliability and security of the transaction. If a transaction is held, fails, or is later invalidated, we may also provide details of the unsuccessful transaction.

We may provide or display customer information to a third-party while consummating transactions to validate that transactions are being exchanged with valid receivers.

We work with third parties, including banks, payment gateways telecom network providers, to enable them to accept or send payments from or to Customers using EG&H Services. In doing so, a third party may share information about customers with us, such as email address or mobile phone number, to inform such customer that a payment has been received or sent. We use this information to confirm that users are EG&H customers, to send customer notification of payment status.

Customer's card information is not stored by EG&H when processing payment information through our websites. Do note that banks, payment gateways and telcom network providers and users involved in transactions may have their own privacy policies, and EG&H does not allow the other transacting party to use this information for anything other than providing EG&H Services. EG&H is not responsible for their actions, including their information protection practices.

EG&H will not disclose your bank account number to anyone or with the third parties that offer or use EG&H Services, except with customers' express permission or if we are required to do so to comply with credit/debit card rules, a subpoena, or other legal processes.

10 SHARING PERSONAL INFORMATION WITH THIRD PARTIES

We may share customers' personal information with:

Members of the EG&H sister companies to provide joint content, products, and services (such as registration, transactions and customer support), to help detect and prevent potentially illegal acts and violations of our policies, and to guide decisions about their products, services, and communications. This information will only be used for marketing communications only if customers have requested for the services.

Financial institutions that we partner with to jointly create and offer a product may only use this information to market EG&H related products unless the customer has given consent for other uses.

Companies that we plan to merge with or are acquired by. (Should such a combination occur, we will require that the new combined entity follow this Privacy Policy with respect to customer personal information. Customers will receive prior notice if personal information would be used contrary to this policy).

Law enforcement, government officials, or other third parties pursuant to a subpoena, court order, or other legal process or requirement applicable to EG&H or one of its affiliates; when we need to do so to comply with law or credit/debit card rules; or when we believe, in our sole discretion, that the disclosure of personal information is necessary to prevent physical harm or financial loss, to report suspected illegal activity or to investigate violations of our User Agreement.

Other unaffiliated third parties, for the following purposes:

- **Fraud Prevention and Risk Management:** to help prevent fraud or assess and manage risk.
- **Customer Service:** for customer service purposes, including to help service your accounts or resolve disputes.
- **Legal Compliance:** to help them comply with anti-money laundering and counter-terrorist financing verification requirements.
- **Service Providers:** to enable service providers under contract with us to support our business operations, such as fraud prevention, winnings payment, marketing, customer service and technology services. Our contracts dictate that these service providers only use customer information in connection with the services they perform for us and not for their own benefit.

Other third parties with your consent or direction to do so.

- Please note that these third parties may be in other countries where the laws on processing personal information may be less stringent than in our country of primary jurisprudence.
- If customers play our games or consume our services on a third-party website, POS terminal or mobile devices or via a third-party application, any information that are entered on such systems (and not directly on an EG&H website) will be shared with the owner of the third-party website or application. These sites are governed by their own privacy policies and customers are encouraged to review their privacy policies before providing them with personal information. EG&H is not responsible for the content or information practices of such third parties.

11 CUSTOMER DATA PROTECTION RIGHTS

Our customers have data protection rights and are entitled to the following:

The right to access – Customer has the right to request copies of their personal data. EG&H may charge a fee for this service if it will require a substantial amount of resources to accomplish.

The right to rectification – Customers have the right to request that EG&H correct any information they believe and have proven have been captured inaccurately. Customers also have the right to request EG&H to complete the information they believe is incomplete.

The right to erasure – Customers have the right to request that EG&H erase their personal data, under certain conditions. These conditions are not limited to regulatory requirements, law enforcement agencies, or where such action may cause disruption to our system.

The right to restrict processing – Customers have the right to request that EG&H restrict the processing of their personal data, under certain conditions. (as above)

The right to object to processing – Customers have the right to object to Our Company's processing of your personal data, under certain conditions. (as above)

The right to data portability – Customers have the right to request that EG&H transfer the data that we have collected to another organization, or directly to them, under certain conditions. (as above)

Customer requests based on any of the rights above shall be handled between 2 to 4 working weeks. Customer may contact us by email or writing:

Email us at dpo@plentymillions.com

Call us at: +234-905-628-2522

Write to us at: EG&H Integrated Concepts Ltd. Plot 575B Muhammadu Sanusi III, Gwarimpa, Abuja. Federal Capital Territory. Nigeria

12 THE USE OF COOKIES AND SIMILAR TECHNOLOGIES

When Customers access our websites or use EG&H Services, we may place small data files on your computer or other devices. These data files may be cookies, pixel tags, "Flash cookies," or other local storage provided by your browser or associated applications (collectively referred to as "Cookies"). These technologies are used to recognize users as customers; customize EG&H Services, content, and advertising; measure promotional effectiveness; help ensure that account security is not compromised; mitigate risk and prevent fraud; and to promote trust and safety across EG&H Services and related sites.

Users can freely decline our Cookies if the web browser or browser add-on permits unless our Cookies are required to prevent fraud or ensure the security of websites we control. However, declining our Cookies may interfere with users' use of our websites and EG&H Services.

13 PRIVACY POLICIES OF OTHER WEBSITES

This privacy policy applies to only EG&H and not any other brands, even though they may be mentioned on our Websites. Neither does it apply to our other related partners.

14 CUSTOMER CONSENT

Please refer to the end of this notice for providing your consent. Your consent to personal data collection and processing may be revoked by notifying us via our contact page. For users below the age of 16, the consent should be provided by the holder of parental responsibility of the child.

Please note, in case you choose to not provide us with the consent or withdraw the consent at any given point of time, we shall not be able to provide the services as detailed in section 2.2 of this notice.

15 CHANGES TO OUR PRIVACY POLICY

We review our privacy policy periodically and when there is any substantial change to business or regulatory requirements. At the minimum, we shall review this annually and communicate via our communication channels such as Newsletter, on Website, Social Media Accounts.

16 HOW TO CONTACT US

Customers who have concerns, questions about the privacy policy or would like to exercise their protection rights can contact us through the following channels:

Email us at dpo@EG&Hgroup.com

Call us: +234-905-628-2522

Customer Contact Centre +234-905-628-2522

Or write to us at EG&H Integrated Concepts Ltd, Plot 575B Muhammadu Sanusi III, Gwarimpa. Abuja. Federal Capital Territory.

17 DECLARATION

I have read all the terms and conditions within this Notice and hereby agree/disagree to use of my personal data for above mentioned purposes.