**ROSETTI PIVOT LIMITED**

**DATA PROTECTION DUE DILIGENCE QUESTIONNAIRE FOR THIRD PARTIES**

Based on the provisions of Nigerian Data Protection Act, 2023 (NDPA), a party to a Data Processing Agreement must take reasonable measures towards ensuring that the other party does not have a record of violating data protection principles and is accountable to a data protection regulator.

In view of the above obligation and in furtherance of the obligations of Rosetti Pivot Limited (“RPL”) under the NDPA, you are required to provide answers to the questions below:

| **QUESTION** | | **ANSWER** |
| --- | --- | --- |
| 1 | Confirm that your organization complies with the provisions of the NDPA and other data protection regulations and legislation.  Please confirm if your Company’s name is on the Nigeria Data Protection Commission (NDPC) list and provide evidence |  |
| 2 | Are you likely to process personal data on behalf of RPL as a result of the Agreement you are about to execute with RPL as counter party? |  |
| 3 | If your answer is in the negative, you can discontinue filling this questionnaire.  If your answer to question 2 is in the affirmative, please provide details of the following –   * Title of the Agreement to be signed with Rosetti Pivot Limited; * Type of Personal Data that will be processed; * Types of Sensitive Personal Data (if any) that will be processed. |  |
| 4 | Do you have any cybersecurity certifications for your organization?  If your answer is in the affirmative, please provide details of the technical and organizational measures that are a part of your data security architecture, including the information security certifications that you hold.  Please provide copies of any certificates the organisation has in order to demonstrate compliance with data protection law, including the NDPA, NDPR, and any other data security standards.  (***Examples are, but not limited to the following - PCI DSS, ISO27001, Cyber Essentials, Cyber Essential Plus)*** |  |
| 5 | Has your organization conducted Data Privacy and Protection Awareness trainings?  **Please provide evidence** |  |
| 6 | Does your organization have data privacy and protection policies and notices in place?  If yes, please enumerate the current policies and notices and provide details of the last time it was reviewed or updated. |  |
| 7 | Do you have a Data Protection Officer?  If yes, provide his job description and confirm whether or not he is playing that role adequately. |  |
| 8 | Have you had any data breach in the last 12 months?  If yes, please provide a summary of the breach. |  |
| 9 | Have you received any complaint from a data subject within the last 12 months about the use or misuse of personal data?    If yes, please provide the details. |  |
| 10 | Have you reported any data breach incident to the NDPC or any other data protection regulator?  **If yes, provide details** |  |
| 11 | Are all staff, agents and key subcontractors used to delivering similar contracts subject to contractual obligations of confidentiality which comply with the NDPA and the NDPR? |  |
| 12 | In the event that you decide to sub-contract part of this work to another contractor, who will process personal information of data subjects within the scope of the engagement, do you have contractual provisions in place that will compel the subcontractor to comply with the provisions of the NDPA and the NDPA? |  |
| 13 | Are you likely to transfer abroad any personal data derived from your engagement with Rosetti Pivot Limited? |  |

**Name of Organization:**

**Name of Representative:**

**Mobile No:**

**Date:**

**Signature:**