PCMN Privacy Policy

Last updated: October 2026. This Privacy Policy explains how Paints & Coatings Manufacturers Nigeria Limited collects, uses, shares and protects personal data, and the rights you have under the Nigeria Data Protection Act 2023 (NDPA). We take the protection of personal data seriously and process it in line with the NDPA and recognised international data protection standards.

1. Who we are

1.1 Paints & Coatings Manufacturers Nigeria Limited (RC 406117), No. 18/24 Ajisegiri Street, Shogunle, Ladipo 102214, Lagos, Nigeria ("PCMN", "we", "us") is the data controller for the personal data described in this policy. PCMN is registered with the Nigeria Data Protection Commission (NDPC).

1.2 This policy applies to personal data we collect through our websites (including pcmnigeria.com and pcmnigeria.site), by email, telephone and in person, and in the course of doing business with our customers, suppliers, contractors and other business contacts. It does not cover our own employees, who receive a separate staff privacy notice.

1.3 You can contact our Data Protection Officer at legal@pcmnigeria.com or by post to the address above, marked for the attention of the Data Protection Officer.

2. The personal data we collect

We collect only the personal data we need for the purposes in section 3:

- **Contact and identity details:** name, job title, employer, business address, email address and telephone numbers.
- **Enquiry and correspondence data:** the content of enquiries, quotation requests, complaints and other communications with us, including through website forms.
- **Website account and order data:** information you give us when you register on our website, place an order online or use interactive features of the website. The form on which we collect it shows what information we ask for.
- **Commercial and account data:** orders, quotations, invoices, delivery details, payment history, credit applications and account records of customers and suppliers, including the individuals who act for them.
- **Technical and project data:** site visit reports, application and inspection records, training attendance and technical claims, which may include the names and roles of the people involved.
- **Website usage data:** IP address, browser and device type, pages visited and similar information collected through cookies and similar technologies (see section 7).
- **Recruitment data:** CVs and application details you send us if you apply for a job.
- **Security data:** visitor logs and CCTV images when you visit our premises.

We do not knowingly collect sensitive personal data (such as health, religious or biometric data) through our website. Please do not send it to us unless we ask for it.

We receive most personal data directly from you. We may also receive it from your employer, from our distributors, principals and partners, or from publicly available sources such as company registries and business directories.

3. How we use personal data and our lawful basis

Under section 25 of the NDPA, we may process personal data only where we have a lawful basis. We use personal data as follows:

Purpose	Lawful basis
Responding to enquiries and quotation requests	Steps at your request before entering a contract; our legitimate interest in responding to business enquiries
Processing orders, deliveries, invoices and payments	Performance of a contract
Managing customer and supplier accounts and credit	Performance of a contract; our legitimate interest in managing credit risk
Technical service, site visits, training and claims	Performance of a contract; our legitimate interest in supporting our products
Health, safety and product information (including SDS and product recalls)	Legal obligation; vital interests
Sending news, product updates and event invitations	Consent, which you may withdraw at any time
Operating, securing and improving our website, and personalising your use of it	Our legitimate interests
Considering job applications	Steps at your request before entering a contract; consent where required
Keeping records for tax, accounting and regulatory purposes	Legal obligation
Preventing fraud, protecting our premises and enforcing our rights	Our legitimate interests; legal obligation

Where we rely on legitimate interests, we balance them against your rights and do not use your data where your interests override ours. We do not sell personal data, and we do not make decisions about you based solely on automated processing that produce legal or similarly significant effects.

4. Who we share personal data with

We share personal data only where necessary for the purposes above, and with recipients bound by confidentiality and data protection obligations:

- **Service providers** who act on our instructions, such as IT, hosting, email, website, accounting software, logistics, courier and security providers.
- **Our product principals and licensors**, where needed for technical support, product claims, warranties or training on their products.
- **Professional advisers**, including lawyers, auditors and insurers.

- **Banks and credit providers**, for payments and credit checks.
- **Government and regulatory authorities**, courts and law enforcement agencies, where required by law or to protect our rights.
- **A buyer or investor**, in connection with a sale, merger or restructuring of all or part of our business, subject to confidentiality obligations.

We share information that identifies you as an individual (as opposed to aggregated information) only as set out above. We may also disclose information about you where you breach this Privacy Policy or our website Terms and Conditions.

5. Transfers outside Nigeria

Some of our service providers, principals and advisers are located outside Nigeria. Where we transfer personal data outside Nigeria, we do so only in accordance with sections 41 to 43 of the NDPA, for example where the recipient country has an adequate level of protection, where appropriate contractual safeguards are in place, or where another ground permitted by the NDPA applies.

6. How long we keep personal data, and how we protect it

6.1 We keep personal data only for as long as needed for the purpose for which it was collected, including to meet legal, tax, accounting and reporting requirements. In general:

- customer and supplier account and transaction records are kept for at least six years after the end of the relationship;
- enquiries that do not lead to business are kept for up to two years;
- unsuccessful job applications are kept for up to twelve months, unless you agree to a longer period;
- marketing preferences are kept until you unsubscribe or withdraw consent; and
- CCTV footage is overwritten within a short period unless needed for an investigation.

6.2 We use appropriate technical and organisational measures to protect personal data against loss, misuse and unauthorised access, including access controls, password protection, secure systems and staff training. If a personal data breach is likely to result in a risk to your rights, we will notify the Nigeria Data Protection Commission and, where required, you, as the NDPA requires.

6.3 Certain sections of our website encrypt data using SSL or a comparable standard. However, no transmission of data over the internet can be guaranteed to be completely secure, so we cannot guarantee the security of information you send to us online.

7. Cookies

7.1 Our website uses cookies and similar technologies. Strictly necessary cookies make the website work. We may also use analytics cookies to understand how visitors use the website so that we can improve it. We do not use cookies to identify you personally or for advertising.

7.2 You can block or delete cookies, and choose whether to accept them, through your browser settings. Blocking some cookies may affect how the website works.

8. Your rights

Subject to the NDPA, you have the right to:

- be informed about how we use your personal data;
- access the personal data we hold about you and receive a copy;
- have inaccurate or incomplete data corrected;
- have your data erased where there is no longer a lawful reason to keep it;
- restrict or object to our processing, including objecting at any time to direct marketing;
- receive your data in a structured, commonly used and machine-readable format and have it transmitted to another controller;
- withdraw consent at any time, without affecting processing carried out before you withdraw it; and
- not be subject to a decision based solely on automated processing that significantly affects you.

To exercise any of these rights, contact our Data Protection Officer at legal@pcmnigeria.com. We may need to verify your identity before responding. We will respond within the time required by law and will not charge a fee unless a request is clearly unfounded or excessive.

If you are not satisfied with how we handle your personal data, you may complain to the Nigeria Data Protection Commission (ndpc.gov.ng). We would appreciate the chance to resolve your concern first.

9. Children

Our website and services are intended for businesses and adults. We do not knowingly collect personal data from anyone under 18. If you believe a child has given us personal data, please contact us and we will delete it.

10. Changes to this policy

We may update this Privacy Policy from time to time. The latest version will always be on our website, with the date it was last updated. Where changes are significant, we will take reasonable steps to tell you.

11. Contact us

Data Protection Officer, Paints & Coatings Manufacturers Nigeria Limited, No. 18/24 Ajisegiri Street, Shogunle, Ladipo 102214, Lagos, Nigeria. Email legal@pcmnigeria.com. Telephone +234 (0)1 342 9083. For general questions about this policy you may also write to info@pcmnigeria.com, and we will respond promptly.

Signed and Date:



MH Thompson

CEO

PCMN/MGT/PP/130 REV: 00