

This Nigeria Privacy Notice is issued in compliance with the Nigeria Data Protection Act 2023 (NDPA) and the Nigeria Data Protection Regulation 2019 (NDPR).

This NIQ Privacy Notice (“**Notice**”) generally describes how ACNIELSEN NIGERIA LIMITED collect and process in connection with your interactions with us or use of our platforms, products, services, panels, surveys, websites (NIQ.com), software, and mobile applications (collectively, the “**Services**”). Other privacy notices may also apply to you, for example if you take part in one of our panels or particular market research activities, and we inform you about these separately.

For the purposes of Nigerian data protection law, ACNIELSEN NIGERIA LIMITED is the Data Controller in respect of Personal Data processed through the Nigeria website and related services.

When referring to “ACNIELSEN NIGERIA LIMITED “NIQ”, “we”, “us”, “our” in this Notice, we are referring to the relevant entity of the NIQ Group responsible for processing your Personal Data. We will inform you which NIQ entity is the controller of your Personal Data, when we engage with you or at the point of collection.

NOTICE AT COLLECTION OF PERSONAL DATA

In this Notice, “**Personal Data**” means any information relating to an identified or identifiable individual (one who can be identified, directly or indirectly, reference to an identifier). This includes details like name and contact information (email address, phone number, etc.). The term also includes “personal information,” or similar terms as defined in applicable law. Personal Data that has been anonymized in such a way that the individual is not and cannot be identified (anonymous data) is no longer considered Personal Data and no longer governed by this Notice.

When we refer to “**Sensitive Data**,” it means Personal Data that, if disclosed, could lead to identity theft, fraud, or significant harm to a consumer. This includes information revealing an individual’s racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, the processing of genetic data, biometric data for the purpose of identifying an individual, data concerning health, sex life, or sexual orientation. The term also includes “special category” data, or similar terms as defined in applicable law.

This Notice at Collection provides some key information about our privacy practices: the categories of Personal Data we collect; how we obtain, share, and maintain Personal Data; and how you can instruct us to stop sharing your Personal Data. We process different types of Personal Data, depending on the collection purpose, but we only collect the data that is necessary for achieving this purpose. Personal Data we process includes, but is not limited to, the following data categories based on your interactions with us, such as an employment applicant, platform or product user, website visitor, panelist and survey respondent, or any other business interactions you may have with our Services.

- **Identifiers and Contact Data**, including name, maiden name, delivery address, email address and telephone numbers.
- **Professional or Employment Data**. If you apply for a job at NIQ or if your employer subscribes to our Services, we collect information from you, such as data concerning

your professional life, company name, job title and role, company email address and phone number, company billing address, information included in your CV, graduation or other relevant certificates, and employers' references.

- **Commercial or Financial Data.** If you authorize us to access such data, we collect transactional information, purchase receipts, sales receipts, delivery confirmations and returns, subscription confirmations and cancellations, registration confirmations, marketing and promotional details, payment card details, details about payments to you or received from you, as well as details of products and services you have purchased from us.
- **User Account Data,** including login credentials (username or similar identifier, password/password hash), preferences, and any feedback you have provided us with.
- **Internet or Other Electronic Network Activity Information,** including time zone setting and location, browser plug-in types and versions, operating system and platform, the pages of our websites and platforms that you visit and the amount of time you spend viewing our websites or using our mobile apps, form field entries, IP address, push notification statuses, browser type, device type, carrier device identifiers such as mobile advertising IDs, and cookie or similar technologies (please also refer to our [Cookie Notice](#)).
- **Marketing and Communications Data,** including your preferences in receiving marketing materials from us and from third parties as well as your preferred communication channels.
- **Research Data** refers to all types of Personal Data we collect from you in the course of your participation in our research activities. It includes the following categories, as detailed in the privacy notices and consent forms for the respective market research activity. Research Data may include or reveal Sensitive Data as explained below.
- Survey Data such as your answers to online, hardcopy, or telephone surveys including sociodemographic information such as title, date of birth, age, gender, information regarding educational and income levels, occupation, marital status, number of children in household.
- Media Measurement Data like your TV and streaming media consumption, overall usage of the internet, streaming and social media platforms and other (online) media channels, as well as your digital devices in general.
- Shopping Behavior Data includes information regarding your household purchases.
- **Inferences** about your interest in purchasing certain types of products or services based on the categories of Personal Data listed above.

You'll typically interact with us if participating in our surveys (as survey respondents) or consumer panels (as a panelist), or otherwise as an end user of our Services. We collect the above categories of Personal Data to provide you with access to and functionality of our Services and to provide our customers with market intelligence, analytics, datasets, and measurement products, which helps them better understand their markets and prospective customers. We will also use the data to enhance our Services or for the more specific purposes

for which it was collected, as well as any additional purposes disclosed at the time of collection.

Our Services use Google Analytics to collect Personal Data, including identifiers and information about your activity on our webpages. You can opt out of the use of this technology through the Google Analytics [opt-out browser add on](#), your Google Ad Settings, your device's Ad Settings for mobile apps, and the [NAI's consumer opt out](#).

Legal Basis of Processing: We process Personal Data in Nigeria on one or more lawful bases recognised under the NDPA, including consent, performance of a contract, compliance with legal obligations, protection of vital interests, and legitimate interests that do not override the rights of Data Subjects.

Exercising Privacy Rights: In accordance with the NDPA and NDPR, you have the right to access, rectify, erase, restrict or object to processing of your Personal Data, withdraw consent at any time, and lodge a complaint with the Nigeria Data Protection Commission (NDPC). If you are interested in exercising one or more of your rights, please use our webform via [Your Privacy Rights](#) or contact us at connect.privacy@nielseniq.com. Because we want to avoid taking action regarding your Personal Data at the direction of some-one other than you, please note that we may request information verifying your identity before we can give effect to these rights. When visiting our website, you may also choose to enable a browser-based signal that automatically communicates your preferences, such as the [Global Privacy Control](#) (GPC). Where required, we will process the GPC signal as a valid privacy request.

Retention: We will retain Personal Data for as long as reasonably necessary to fulfill the purposes described in this Notice, or to comply with our legal obligations, resolve disputes, and enforce our agreements. Our data retention periods reflect several factors, including our relationship with you and those who use our Services, the nature and sensitivity of the Personal Data, and what is reasonably necessary and proportionate to provide and improve our services. When we engage third parties, they will store Personal Data on their systems for as long as is necessary in connection with their provision of services to us in accordance with our service provider contracts.

1. HOW WE COLLECT AND USE PERSONAL DATA

We collect Personal Data (a) that you provide directly to us; (b) automatically when you use the Services; and (c) from third parties. In addition to the specifics below, we may also use your Personal Data for other purposes disclosed at the time you provide your information or otherwise with your consent.

Data You Provide. We collect Personal Data when you participate in or enroll to use our Services. For instance, we collect your email address and login credentials if you subscribe to our Services, and your mailing address if we need to deliver products and survey materials to you. When you submit questions, request information, exercise your privacy rights, or give us feedback and testimonials, we may ask you for data such as:

- Identifiers, like your name, postal address, telephone number, and email address.
- Professional Data, like your industry of work, company name, and title or role.
- Audio, Electronic, Visual, or Similar Interaction Data, such as your messages, comments, testimonials, and uploads (photos, audio and video recordings, etc.).

- Other Personal Data relevant to your question, request, or feedback, such as your preferred contact method or preferred language.

We collect this data based on our legitimate interest or, when necessary, with your consent. We use this Personal Data for the following business and commercial purposes:

- To operate, maintain, and improve our Websites and related services
- To process your request for information or otherwise complete a transaction or service you request or authorize
- To respond to and resolve your requests and correspondence
- To contact you, such as through bots, about our products and services, such as providing you with promotional materials or offers, and to send you other communications about our business and events (including communications based on your interests, personal and business characteristics, and location). We may provide these communications and offers via email, postal mail, online, social media platforms, text messages, and other means.
- For analytics, insights, product development, and market dynamics and/or research

We store this information until you revoke your consent or unsubscribe from our Services or our mailing lists, which you can do at any time. Once you unsubscribe, we will cease sending you marketing communications, though we may still contact you as necessary to fulfill any services you have requested, to include when you've consented to be recontacted.

Data Collected Automatically. We receive certain data about the computer or device you are using when you use our Services. We collect this data based on our legitimate interest and, when necessary, with your consent through your cookie preferences. Such data includes:

- Internet or Other Electronic Network Activity Information, collected passively when you visit and/or interact with our websites and mobile apps, such as browser type and version, device operating system type and version. We also collect data about videos or other content you view on our websites, like the type and name of the content and the time viewed.
- Approximate Location, (city, region, country) based on the IP address assigned to the device that you use to access our Websites and related services.
- Cookies and Other Similar Technologies, including the date and time of your visit and the webpage you visited immediately prior to visiting our Websites.

We use this Personal Data for the following business and commercial purposes:

- To protect the rights, safety, property, or operations of one or more NIQ affiliates, you, or others
- To customize or personalize your user experience and the content we deliver to you, including to provide you with content that is more relevant to you
- For analytics, insights, product development, and/or research, such as identifying usage trends
- To improve our Websites and our existing products and services

- To assess the performance of and optimize our advertisements and campaigns
- To determine the effectiveness of our communications

We store this information until you revoke your consent or change your cookie settings. For more information about tracking technologies and the rights you may have over this information, visit our [Cookie Notice](#). To adjust your cookie settings, select “Your Cookie Choices” on the cookie banner, also located in the footer of our websites.

Data From Third Parties. We may collect and combine information about you from third-party data providers. We collect this data based on our legitimate interest and, when necessary, with your consent.

- [Demographic Data](#), such as age and income ranges, your preferred language and household size
- Approximate Location, like your city, region, and country, or whether you live in an urban or rural area.
- Analytics and Marketing Information, to include information about which ads have been displayed to you online from third-party websites, advertising measurement vendors, and other sources.
- Commercial Information, such as products or services you’ve purchased, obtained, or considered or other purchasing and consumption histories or tendencies.
- Behavioral Information, like your internet usage, media consumption habits, and shopping preferences.

We combine the information collected from our panelists with information provided by our customers, such as your purchase records. We use this Personal Data from third parties:

- To improve the market research, analytics, and other products that we provide to our customers
- To analyze ads that have been displayed to you online, to help us measure the effectiveness of ad campaigns
- To perform analysis or to create lookalike models and audiences, helping our customers understand their prospective customers.

We store this information until you revoke your consent, change your settings, or unsubscribe from a NIQ Service or mailing list, which you can do at any time.

Other Uses of Personal Data. In addition to the uses described above, we use Personal Data from all categories of sources for these commercial and business purposes, to the extent permitted under applicable law:

- To monitor, protect, and maintain the security of our Websites, services, and business operations
- To comply with applicable law and/or respond to requests and communications from law enforcement authorities or other government officials.

- To carry out corporate restructures, sales, and business transactions in which information held by us is among the assets transferred or is otherwise relevant to the transaction
- To protect our rights, privacy, safety, property and/or those of others
- To fulfill any other purpose explained to you at the point of collection, or with your consent

We collect this data based on our legal obligations, our legitimate interest and, when necessary, with your consent. We store this information for only as long as necessary or required, subject to our internal retention protocols and applicable legal or statutory retention periods.

2. HOW WE DISCLOSE PERSONAL DATA

We may disclose Personal Data (in accordance with applicable law) for the purposes described above to our customers, service providers, and third parties, including those that provide advertising and analytics services.

- **Our Customers.** If you use our Websites or services, we may provide data about and derived from data you authorize and allow us to access. Generally, we develop lookalike advertising models, audiences, and segments and ensure that you (as our panelists and survey respondents) are not targeted for direct marketing or sales purposes.
- **Our Corporate Affiliates,** which include our subsidiaries listed [here](#), the NIQ Group.
- **Our Service Providers.** We disclose your Personal Data to our service providers that provide business, professional, or technical support services to us, help us operate our businesses, Websites, and services, or administer activities on our behalf. We require our service providers to only use your Personal Data in connection with providing services to the NIQ Group.
- **Advertising, Measurement, and Analytics Providers.** We may disclose Personal Data to third parties to help create models that are used to deliver and evaluate customers' advertising campaigns. In addition, we make available information from our services to allow our analytics providers to help us understand how visitors use our products and services and how to improve them. We also collect information about your interactions with emails we send to you, such as whether you forwarded the message or clicked through to our websites after opening it.

In certain circumstances, we may disclose each category of your Personal Data to:

- **Governmental, Regulatory, and Public Authorities.** We may disclose your Personal Data to government and law enforcement authorities to comply with legal or regulatory obligations or requests.
- **Relevant Third Parties as Part of a Corporate Transaction.** In the event of a reorganization, merger, sale, joint venture, assignment, transfer, or other disposition of all or any portion of our business, assets, or stock (including in connection with a bankruptcy or similar proceeding), we may disclose or transfer your Personal Data to certain third parties, such as the acquiring entity and its advisers.
- **Other Third Parties.** We will disclose your Personal Data to other third parties at your direction or with your consent. Additionally, we will disclose your Personal Data as

necessary or appropriate to: (a) comply with applicable law; (b) enforce our terms and conditions; (c) protect our operations; (d) protect our rights, privacy, safety, or property, and/or those of you or others; and (e) allow us to pursue available remedies or limit damages that we may sustain.

In addition, we may disclose your Personal Data for other reasons that we will describe at the time of information collection or prior to disclosing your information.

When we disclose Personal Data, we take contractual, technical, and organizational measures that are designed to limit the recipients' use to specific purposes that are consistent with our Privacy Notices and in accordance with applicable law.

To the extent permitted under applicable law, we may deidentify, anonymize, or aggregate Personal Data so that it will no longer be considered Personal Data. Once deidentified, we do not attempt to reidentify the data. We ensure it will not be reidentified by implementing strict technical and organizational measures to prevent reidentification and use contractual measures to ensure third parties adhere to the same non-reidentification commitments. Our use and disclosure of deidentified, anonymized, or aggregated information is not governed by this Notice.

3. AUTOMATED DECISION MAKING AND PROFILING

We use automated processes to infer information about you and to create our products and services, such as lookalike audiences that our customers use for interest-based advertising. To the extent that these activities constitute automated decision making or profiling, we take steps to do so in a fair and non-discriminatory manner. We do not process your Personal Data for profiling that produces a legal or similar significant effect, such as a decision to offer to you or decline your request for employment or a loan.

4. DATA AUTHORIZATIONS AND RESTRICTIONS

Your Data Authorizations. Generally, our collection of Personal Data is based on your consent. You authorize us to access and process your Personal Data by agreeing to this Notice or another version you received at the point of collection. You are not obligated to provide your Personal Data and can opt out/withdraw consent to our processing at any time. Without access to your Personal Data, we may not be able to provide the full range of our services or respond to your inquiries effectively.

Unsubscribing from our Marketing and Promotional Communications. From time to time, we may send you marketing and promotional communications from the NIQ Group. If you no longer wish to receive these emails from us, you may opt out by following the instructions included in any promotional or marketing email you receive from us.

Industry-Based Advertising Choices. In addition to exercising privacy rights through our services, you can opt out of receiving certain targeted or interest-based advertisements using tools provided by the advertising industry. You will still receive ads, but they might be less relevant to your interests. Please note, you will need to opt out separately on all of your browsers and devices. If you delete or reset your cookies or mobile identifiers, change browsers, or use a different device, you may need to repeat the opt-out process for that device or browser.

- Network Advertising Initiative (NAI): <https://optout.networkadvertising.org/?c=1>
- Digital Advertising Alliance (DAA): <https://youradchoices.com/control>

- The DAA offers a tool (available at <https://www.aboutads.info/appchoices>) for opting out of the collection of cross-app data on mobile devices for interest-based advertising.
- European Interactive Digital Advertising Alliance (EDAA): <https://youronlinechoices.eu/>
- Your device operating system may provide mechanisms that allow you to opt in or opt out of the use of information about your use of mobile apps to deliver interest-based advertising to your mobile device. For more information, consult your device settings.

5. PRIVACY RIGHTS AND CHOICES

Our Services are made available by the NIQ Group; For Personal Data processed in connection with the Nigeria website and related services, **ACNIELSEN NIGERIA LIMITED** acts as the Data Controller in accordance with the Nigeria Data Protection Act 2023 (NDPA) In accordance with applicable law (and subject to certain exceptions), you may have certain rights in relation to your Personal Data, including the right to:

- **Access your Personal Data (including a copy in a portable format).** You may have the right to request a privacy report detailing the Personal Data we maintain about you and the purposes for doing so, unless your request proves impossible or would involve disproportionate effort to fulfill. Under certain conditions, you may request that we transfer your Personal Data to another organization, or directly to you, but we may not be required to respond to your requests “to know” or access specific pieces of Personal Data more than twice in any 12-month period.
- **Request a List of Third Parties,** with whom we share or disclose your Personal Data, though we are not required to provide the names of NIQ Group customers or other trade secrets.
- **Correct or Rectify** inaccurate Personal Data that we maintain about you, subject to appropriate verification.
- **Delete or Erase** the Personal Data that we maintain about you, under certain conditions. We may be unable to delete your information without also deleting your account with us.
- **Restrict or Limit Processing** of the Personal Data that we maintain about you, under certain conditions. This includes a right to restrict the use or disclosure of your Personal Data of a sensitive nature, where applicable.
- **Object to Processing** the Personal Data that we maintain about you based on our legitimate interest, under certain conditions. We will no longer process your Personal Data unless we can demonstrate compelling legitimate grounds for the processing which override your interests or for the establishment, exercise, or defense of legal claims.
- For our mobile apps: To opt out/withdraw consent through our apps, visit the “My Settings” menu and where you can indicate your preferences. At present, we cannot use opt-out preference signals to opt you out of sales through our apps.
- **Opt Out of Automated Processing or Profiling** resulting in a decision based solely on automated processing, including profiling which produces legal effects concerning you

or similarly significantly affects you. As a reminder, we do not process your Personal Data for these purposes.

- **Withdraw Consent** at any time where we rely on consent as the legal basis, with effect for the future, by using the contact information below.
- **Appeal or Lodge a Complaint** You have the right to lodge a complaint with the **Nigeria Data Protection Commission (NDPC)** if you believe your Personal Data has been processed in violation of applicable Nigerian data protection laws

We empower and support the exercise of your rights. At any time, you may request or assert any of the rights listed above by selecting [Your Privacy Rights](#) from our websites or by emailing us at connect.privacy@nielseniq.com. We will assess any request after confirming your identity and work to respond within applicable legal deadlines, and let you know if we need additional time. If you believe there has been a violation of your privacy rights, please contact us or the supervisory authority.

We may take steps to confirm your identity before responding to your request by asking you a series of questions about your previous interactions with us. We may decline a request (other than an opt-out request) if we are unable to confirm your identity (or an agent's authority to make the request) or confirm the Personal Data we maintain relates to you.

The NIQ Group does not discriminate against you if you decide to exercise your privacy rights.

6. AUTHORIZED AGENT REQUESTS

Only you, or someone legally authorized to act on your behalf, may submit a request related to your Personal Data.

In accordance with applicable law, you may authorize someone to make a privacy rights request on your behalf (an “**Authorized Agent**”). To confirm their authority, Authorized Agents need to demonstrate that you've authorized them to act on your behalf. Authorization must be done in writing and signed, and the writing must identify the agent and explain what request they are authorized to make. Your Authorized Agent must include a copy of this writing or a copy of a valid power of attorney with the request. The NIQ Group retains the right to request confirmation directly from you, confirming that the agent is authorized to make such a request, or to request additional information that is necessary to identify you.

Submit Authorized Agent requests at [Your Privacy Rights](#) by uploading the authorization documentation or submit the complete request with attachments via email to connect.privacy@nielseniq.com.

7. TRANSFERS OF PERSONAL DATA

Due to the international nature of our business, it may be necessary for us to transfer your Personal Data to other companies within the NIQ Group and to third parties outside the jurisdiction in which you reside that may not have the level of data protection that you enjoy under your jurisdiction (“**Third Countries**”). This can, for example, result in impeded enforcement of individuals' rights, a lack of control over further processing, and access by state authorities.

Within the NIQ Group, we have concluded an intra-group data transfer agreement with the relevant transfer mechanisms and additional safeguards to ensure an adequate level of protection for your Personal Data when it is transferred from to Third Countries.

Insofar as we transfer your Personal Data to other recipients in Third Countries, we ensure that your Personal Data is protected by adequate safeguards recognized by your jurisdiction (for example, by concluding standard contractual clauses of the European Commission or by means of binding corporate rules of our business partners) and supplementary measures, as necessary. You can contact us to obtain a copy of the transfer mechanisms.

8. PERSONAL DATA OF MINOR CHILDREN

We understand the importance of protecting the privacy of minor children, especially in the online environment. Our websites and Services are not designed for or intentionally directed toward individuals under the age of 18. We only process the Personal Data of individuals under age 18 to the extent permitted by law and with prior consent of the parent or legal guardian. If we learn that we have inadvertently collected or received Personal Data from individuals under 18, we will delete the Personal Data or take other steps to comply with applicable law.

We do not knowingly sell or share directly identifiable Personal Data about individuals under the age of 18. Parents or guardians may opt-out of processing or exercise any other privacy rights on behalf of individuals under age 18 at any time by navigating to [Your Privacy Rights](#), also located in the footer of our websites.

9. DATA SECURITY AND EXTERNAL LINKS

We maintain a comprehensive information security program with administrative, physical, and technical safeguards to maintain the confidentiality, integrity, and accessibility of your information. However, as no transmission of information over the internet is absolutely secure, we cannot guarantee the safety of your information.

Our Websites and services may contain links to third-party sites and services, such as social media websites, which may have privacy policies that differ from our own. We are not responsible for the practices of these third-party sites and services. We encourage you to review their privacy information to learn more about their practices.

10. REVISIONS TO OUR NOTICES

We reserve the right to change, modify, add, remove, or otherwise revise portions of our Privacy Notices at any time, for example as our products and services develop and evolve, to comply with legal requirements, or to address changes in our business practices. When we do, we will post the revised Notice where it is displayed for our Websites or services, including software and mobile applications made available by us. Your continued use of our Websites or services following the posting of changes to these terms means you acknowledge these changes. If we change the Notice in a material way, we will provide appropriate notice to you and update the date at the top of the Notice.

11. HOW TO CONTACT US

If you have any questions or concerns about this Notice, our privacy practices and the protection of your Personal Data, or the privacy rights and choices available to you described in this Notice, you may contact us in the following ways:

Webform	Your Privacy Rights
Email	connect.privacy@nielseniq.com
Data Controller	ACNIELSEN NIGERIA LIMITED
Postal Mail	146C Ligali Ayorinde Street, Victoria Island, Lagos State, Nigeria
Data Protection Officer	HewardMills Ltd. 77 Farringdon Road, London, EC1M 3JU, United Kingdom niq@hewardmills.com