

March 2021

Data Privacy Policy

LIGHTHOUSE CAPITAL LIMITED PRIVACY POLICY

1. Introduction

This Privacy Policy gives you a clear view of how we use personal information that you provide, our dedication to protecting it and your rights and the options you must control your personal information and protect your privacy. It also outlines what personal information we collect about you when you visit our website, speak to our support staff, or investment experts and how we use your personal information. It also sets out how to contact us if you have any questions about this privacy policy or want to make a complaint to us about how we handle your personal information.

2. What information do we collect about you?

The personal data that we collect, and process may include:

- 2.1 basic information such as name, date of birth, employer, title, age, relationship affiliations with a person or organization.
- 2.2 contact information such as physical address, email address, fax and telephone.
- 2.3 technical information (including your IP address): Information obtained from a visit to our website.
- 2.4 payment details.
- 2.5 confidential information generated by us while providing our services.
- 2.6 details relating to your visits to our offices; and/or
- 2.7 any other information relating to you which you may provide to us.

Lighthouse Capital Limited will only collect information that is necessary for the provision of the product or service that you have subscribed to. The type of information collected will depend on the nature of the product or service demanded.

3. How we protect your personal Information

We are committed to protecting your personal information and implementing appropriate technical and organizational security measures to protect it against any unauthorized or unlawful processing and against any accidental loss, destruction or damage.

Our security policies are attached as Schedule 1 to this Privacy Policy in our INFORMATION SECURITY POLICY

4. How we use your Personal information

We will only use your personal information if and to the extent that applicable law allows.

- 4.1 Processing your transaction: we use relevant personal information described above to process and deliver your transaction and to notify you of the status of your transaction.

- 4.2 Ability to proceed with an offer on our products or services: We will process your personal information for the purposes of our legitimate interests in determining your ability to proceed with a transaction or agreement so that we have an informed choice should there be an offer. This also has the potential to speed up any subsequent transaction.
- 4.3 To engage with you in relation to our products and services: we will use your personal information to provide you with the products and services you have requested from us, to conduct market research surveys, for statistical analysis to determine application usage and for direct marketing purposes relating to our business. We will process your personal information in this way if it is necessary for the performance of the contract with us.
- 4.4 To do all things necessary to comply with our customers' instructions and our legal obligations to our customers and in compliance with privacy legislations such as NDPR.

We will therefore only process your personal information if:

- 4.5 you have given your consent (where necessary) to such use or the organisation you work for has obtained your consent (where necessary) to share your information with us; or
- 4.6 if we have a legitimate interest which is not overridden by your interests or your rights and freedoms.

If you have given us your express consent, we may process your personal data for additional purposes. **Please note that you may withdraw your consent at any time, you may so wish.**

5. If you fail to provide personal data?

Where we need to collect personal data by law, or under the terms of a contract we have with you, and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with our products or services). In this case, we may have to cancel a product or service you have with us, but we will notify you if this is the case at the time.

6. How is your personal data collected?

We use different methods to collect data from and about you including through:

- 6.1 **Direct interactions.** You may give us your identity, contact and financial data by filling in forms or by corresponding with our support staff by post, phone, email or otherwise. This includes personal data you provide when you:
 - 6.1.1 apply for our products or services.
 - 6.1.2 create an account on our website.

- 6.1.3 subscribe to our service or publications.
- 6.1.4 request marketing to be sent to you.
- 6.1.5 enter a competition, promotion, or survey or
- 6.1.6 give us feedback or contact us.

7. **Sharing your personal data**

Irrespective of how we obtain your personal data, it may be shared among all our offices as may be found on our website. All our offices will always ensure at least a standard level of data protection is always in place. Where we share your personal data with third parties, we will do this in accordance with applicable data protection laws and will take appropriate safeguards to ensure its protection. Your personal information may also be transferred to countries or jurisdictions which may not provide the same level of data protection as us. If we do make such a transfer, we will, if appropriate, put a contract in place that imposes obligations on our counterparties to protect your information.

8. **Marketing**

We would like to send you information about our *products and services and special offers* which may be of interest to you. Where we have your consent or it is in our legitimate interests to do so, we may do this by post, email, telephone, text message (SMS) or automated call. We will only ask whether you would like us to send you marketing messages when you tick the relevant boxes. If you have previously agreed to being contacted in this way, you can unsubscribe at any time by contacting us at Lighthouse Capital Limited Head office, 2nd Floor, 39, Adeola Odeku Street, Victoria Island, Lagos or by using the 'unsubscribe' link in emails or 'STOP' number in texts.

9. **Retaining your personal data**

We will only retain your personal information for as long as is necessary for the purpose for which it was collected, including for the purposes of complying with any legal, regulatory, accounting or reporting requirements. We will delete your personal data when it is no longer reasonably required for the authorized uses or you withdraw your consent (whichever is applicable), provided that we are not legally required or otherwise authorized to continue to hold such data.

10. **Your rights**

In addition to your rights under applicable data protection legislation and where we are authorized or required by applicable law and by our professional obligations, we will provide you, upon request, with a copy of your personal data and we will correct any errors identified by you. Except as provided above, we will not use your data for any automated decision making or any profiling. You also have the right to withdraw your consent for a specific processing at any time. Once we

have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

11. Opting out

You can ask us to stop sending you marketing messages at any time [by logging into the website and checking or unchecking relevant boxes to adjust your marketing preferences **OR** by following the opt-out links on any marketing message sent to you **OR** by contacting us at any time].

Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of [a product/service purchase, warranty registration, product/service experience or other transactions].

You are entitled to remedies for breach of your rights and the NDPR as stated in Schedule 2 to this Privacy Policy titled **PERSONAL DATA BREACH & INCIDENT HANDLING PROCEDURE**

12. Other websites

Our website may contain links to other websites. This Privacy Policy only applies to this website so when you link to other websites you should read their own privacy policies.

13. Changes to our Privacy Policy

We keep our Privacy Policy under regular review and we will place any updates on this web page. This Privacy Policy was last updated on 1 March 2021.

If you would like to exercise any of these rights, please contact us by emailing info@lighthousecapital.ng