PRIVACY POLICY

1. Introduction

Lighthouse Capital Limited ("the Company", "we", "our", or "us") is a company duly incorporated in Nigeria and licensed by the Securities and Exchange Commission ("SEC") as a Capital Market Operator.

We are committed to protecting the privacy and confidentiality of our clients, investors, employees, business partners and website users. This Privacy Policy explains how we collect, use, store, disclose and protect your personal information in accordance with the Nigerian Data Protection Act 2023, applicable SEC Rules, the Investments and Securities Act, Anti-Money Laundering laws and other applicable legislation.

By accessing our website, mobile application or using any of our services, you consent to the collection and processing of your personal data as described in this Policy.

2. Information We Collect

To provide our services, comply with legal and regulatory obligations, and manage our business effectively, Lighthouse Capital Limited may collect, use, store, and process the following categories of information:

2.1 Personal Identification Information

Lighthouse Capital Limited may collect and process personal identification information necessary to establish and verify the identity of individuals, comply with applicable legal and regulatory requirements, prevent fraud, and facilitate the provision of our products and services. The categories of personal information we may collect include, but are not limited to:

- Full Name
- Residential and Mailing Address
- Email Address
- Telephone and Mobile Numbers
- Date and Place of Birth
- Nationality
- Gender
- Marital Status

- Passport Photograph
- Signature (Physical and Electronic)
- National Identification Number (NIN)
- Bank Verification Number (BVN)
- Tax Identification Number (TIN)
- International Passport Number
- Driver's Licence Number
- Permanent Voter's Card Number
- Means of Identification and copies of identity documents

2.2 Financial and Investment Information

To establish, manage, and administer investment accounts, execute capital market transactions, assess suitability, comply with regulatory obligations, and provide our products and services, Lighthouse Capital Limited may collect and process financial and investment information, including but not limited to:

- Bank Account Details
- Bank Verification Number (BVN)
- Account Name and Account Number
- Investment Objectives and Risk Profile
- Income and Source of Wealth
- Employment and Occupation Details
- Transaction History
- Trading History
- Securities Holdings
- Dividend Mandate Information
- Payment Records
- Credit and Financial Information where applicable

2.3 Corporate Information (For Corporate Clients)

Where the customer is a corporate entity, partnership, trust, association, or other legal person, Lighthouse Capital Limited may collect and process corporate information to verify the entity's identity, establish beneficial ownership, comply with legal and regulatory requirements, and facilitate the provision of our products and services. Such information may include:

- Certificate of Incorporation or Business Registration
- Company Registration Number (RC Number)
- Memorandum and Articles of Association (or Constitution)
- Registered and Business Addresses
- Tax Identification Number (TIN) and Tax Clearance Certificate (where applicable)
- Details of Directors, Shareholders, Beneficial Owners, and Authorised Signatories
- Board Resolutions and Corporate Authorisations
- Corporate Bank Account Details
- Beneficial Ownership Information
- Financial Statements and Regulatory Licences (where applicable)
- KYC, Customer Due Diligence (CDD), and AML/CFT Documentation
- Corporate Contact Information
- Any other information required by applicable laws, regulations, or regulatory authorities.

2.4 Technical and Electronic Information

When you access or interact with our website, mobile applications, online trading platforms, client portals, or other digital services, Lighthouse Capital Limited may automatically collect technical and electronic information to enhance security, improve service delivery, prevent fraud, and comply with legal and regulatory requirements. Such information may include:

- IP Address and Device Information
- Browser, Operating System, and Network Information

- Login Credentials and Authentication Records
- Date, Time, and Frequency of Access
- Website and Mobile Application Usage Data
- Cookies and Similar Tracking Technologies
- Location Data (where permitted by law)
- Transaction Logs, System Event Logs, and Audit Trails
- Security Logs and Fraud Detection Information
- Error Reports, Performance Analytics, and Diagnostic Data
- CCTV and Access Control Records (where applicable)
- Any other technical information required to secure our systems and comply with applicable legal, regulatory, and cybersecurity requirements.

2.5 Communications and Customer Service Information

Lighthouse Capital Limited may collect and process information relating to your communications and interactions with us to manage customer relationships, respond to enquiries, process instructions, resolve complaints, improve service delivery, and comply with legal and regulatory requirements. Such information may include:

- Email, SMS, letters, and other written correspondence
- Telephone conversations and call recordings (where permitted by law)
- Live chat, instant messaging, and social media interactions through the Company's official channels
- Customer enquiries, complaints, feedback, and support requests
- Instructions, mandates, and authorisations
- Meeting records, survey responses, and customer satisfaction assessments
- Communication preferences, contact history, and related supporting documents.

2.6 Regulatory and Compliance Information

To comply with applicable legal, regulatory, and supervisory requirements, Lighthouse Capital Limited may collect and process regulatory and compliance information for customer identification and verification, risk assessment, fraud prevention, financial crime detection, and statutory reporting. This information may include:

- Know Your Customer (KYC) and Customer Identification Records
- Customer Due Diligence (CDD) and Enhanced Due Diligence (EDD) Documentation
- Anti-Money Laundering, Counter-Terrorism Financing, and Counter-Proliferation Financing (AML/CFT/CPF) Information
- Politically Exposed Person (PEP) Status
- Sanctions, Watchlist, and Adverse Media Screening Results
- Source of Funds, Source of Wealth, and Beneficial Ownership Information
- Regulatory Declarations and Tax Residency Information
- Customer Risk Assessment and Transaction Monitoring Records
- Suspicious Transaction Reports (STRs) and Other Regulatory Reports, where required
- Compliance Monitoring, Investigation, and Regulatory Correspondence
- Any other information required by applicable laws, regulations, or regulatory authorities.

2.7 Information from Third Parties

Where permitted by applicable law and where necessary for legitimate business, contractual, legal, or regulatory purposes, Lighthouse Capital Limited may obtain and process personal information from trusted third-party sources to verify the accuracy of information provided, perform customer due diligence, facilitate transactions, assess risk, prevent fraud, and comply with applicable legal and regulatory requirements. Such third-party sources may include, but are not limited to:

- Credit Bureaus
- Identity Verification Agencies
- Banks and Financial Institutions
- Regulators
- Publicly Available Sources
- Business Partners

- Service Providers
- Government Agencies

3. How We Collect Information

Lighthouse Capital Limited collects personal information directly from you, automatically through your use of our digital platforms, and from authorised third parties, in accordance with applicable laws and regulatory requirements. We collect information through various channels, including:

- Account opening and client onboarding processes
- Know Your Customer (KYC), Customer Due Diligence (CDD), and Enhanced Due Diligence (EDD) procedures
- Completed application forms, declarations, and supporting documentation
- Our website, mobile applications, online trading platforms, and client portals
- Customer service interactions, enquiries, complaints, and support requests
- Email, telephone, live chat, social media, and other communication channels
- Transactions executed through our systems and SEC-approved market infrastructure, including exchanges, registrars, and clearing and settlement systems
- Identity verification service providers, banks, payment service providers, and other authorised financial institutions
- Regulatory authorities, government agencies, and law enforcement bodies
- Credit bureaus, public registries, and other lawful third-party sources where permitted by law
- Cookies, website analytics, server logs, and similar technologies used on our digital platforms
- CCTV, access control systems, and visitor management records at our premises, where applicable.

4. Purpose of Processing Personal Data

Lighthouse Capital Limited processes personal data only for lawful, legitimate, and specified purposes in accordance with applicable data protection laws and regulatory requirements. We may process your personal data for the following purposes:

- Opening, administering, and managing investment and client accounts
- Executing, settling, and recording securities and capital market transactions
- Verifying customer identity and conducting Know Your Customer (KYC), Customer Due Diligence (CDD), and Enhanced Due Diligence (EDD) procedures
- Preventing fraud, identity theft, financial crime, and unauthorised transactions
- Detecting and preventing money laundering, terrorist financing, and other illicit activities
- Complying with the requirements of the Securities and Exchange Commission (SEC), Nigerian Exchange Limited (NGX), Central Securities Clearing System (CSCS), Nigeria Data Protection Commission (NDPC), and other applicable regulators
- Meeting statutory, legal, regulatory, tax, and reporting obligations
- Processing dividends, corporate actions, settlements, refunds, and other investment-related transactions
- Preparing and issuing investment statements, transaction confirmations, and regulatory disclosures
- Responding to enquiries, requests, complaints, and customer support needs
- Communicating important service, security, and regulatory updates
- Improving customer experience, products, digital platforms, and service delivery
- Conducting risk management, compliance monitoring, business analytics, and operational oversight
- Performing internal audit, investigations, governance, and quality assurance activities
- Enforcing contractual rights and obligations, resolving disputes, and protecting the Company's legal interests
- Managing business continuity, information security, cybersecurity, and incident response
- Any other purpose permitted or required under applicable laws, regulations, or with your consent where required.

5. Legal Basis for Processing

Lighthouse Capital Limited processes personal data only where there is a lawful basis for doing so in accordance with the Nigeria Data Protection Act (NDPA), 2023, and other applicable laws and regulations. We may process your personal data on one or more of the following legal bases:

- **Consent:** Where you have freely given your consent for the processing of your personal data for one or more specific purposes.
- **Performance of a Contract:** Where processing is necessary to enter into, perform, or manage a contract or provide the products and services you have requested.
- **Legal and Regulatory Compliance:** Where processing is required to comply with applicable laws, regulations, court orders, or obligations imposed by regulatory authorities, including the Securities and Exchange Commission (SEC), Nigerian Exchange Limited (NGX), Central Securities Clearing System (CSCS), the Nigeria Data Protection Commission (NDPC), and other competent authorities.
- **Vital Interests:** Where processing is necessary to protect your vital interests or those of another individual.
- **Legitimate Interests:** Where processing is necessary for the legitimate interests of Lighthouse Capital Limited or a third party, provided that such interests do not override your fundamental rights and freedoms. This includes fraud prevention, risk management, information security, internal audit, business administration, service improvement, and the protection of the Company's legal and financial interests.
- **Public Interest or Exercise of Official Authority:** Where processing is necessary for reasons of substantial public interest or in the exercise of official authority vested in the Company under applicable laws.

6. Disclosure of Personal Information

Lighthouse Capital Limited may disclose your personal information to third parties where necessary to provide our services, comply with legal and regulatory obligations, protect our legitimate interests, or where you have authorised such disclosure. Personal information may be disclosed to, but is not limited to:

- Securities and Exchange Commission (SEC)
- Nigerian Exchange Limited (NGX)
- Central Securities Clearing System (CSCS)
- Central Bank of Nigeria (CBN)

- Nigeria Data Protection Commission (NDPC)
- Nigerian Financial Intelligence Unit (NFIU)
- Law enforcement, judicial, and other government agencies
- Tax authorities and other statutory bodies
- Banks, financial institutions, and payment service providers
- Credit bureaux and identity verification service providers
- External auditors, legal advisers, and professional consultants
- Technology vendors, cloud hosting providers, and other authorised service providers
- Business partners, contractors, and outsourced service providers engaged by the Company
- Any other person or organisation where disclosure is required or permitted by applicable law, regulation, court order, or with your consent.

7. International Transfer of Personal Data

Lighthouse Capital Limited may transfer personal data outside Nigeria where necessary for legitimate business operations, the provision of services, regulatory compliance, or the use of authorised third-party service providers. Where such transfers occur, the Company shall ensure that:

- The transfer is carried out in accordance with the Nigeria Data Protection Act (NDPA), 2023, and other applicable laws and regulations.
- Appropriate technical, organisational, and contractual safeguards are implemented to protect the personal data.
- The recipient is subject to adequate data protection standards or provides an equivalent level of protection.
- The transfer is based on a lawful mechanism, including contractual obligations, regulatory requirements, the data subject's consent (where applicable), or other lawful grounds recognised under applicable law.
- Personal data remains secure and is protected against unauthorised access, disclosure, alteration, loss, or misuse throughout the transfer and subsequent processing.

8. Data Retention

Lighthouse Capital Limited retains personal information only for as long as necessary to fulfil the purposes for which it was collected and to comply with applicable legal, regulatory, contractual, and operational requirements. Personal data may be retained to:

- Comply with the Nigeria Data Protection Act (NDPA), 2023, and other applicable laws.

- Meet the record retention requirements of the Securities and Exchange Commission (SEC), Nigerian Exchange Limited (NGX), Central Securities Clearing System (CSCS), tax authorities, and other regulatory bodies.
- Fulfil contractual and statutory obligations.
- Support internal audit, compliance, investigations, and regulatory examinations.
- Resolve disputes, respond to legal claims, and enforce the Company's legal rights.
- Maintain business continuity and historical records where permitted by law.

9. Security Measures

Lighthouse Capital Limited implements appropriate technical, physical, and organisational measures to protect personal data against unauthorised access, disclosure, alteration, loss, misuse, or destruction. These measures are regularly reviewed and enhanced to address evolving cybersecurity threats and regulatory requirements and include, but are not limited to:

- Data encryption and secure transmission of information
- Firewalls, intrusion detection, and intrusion prevention systems
- Multi-factor authentication (MFA) and strong password controls
- Role-based access controls and the principle of least privilege
- Secure servers, networks, and cloud infrastructure
- Regular vulnerability assessments, penetration testing, and security audits
- Continuous security monitoring, logging, and incident detection
- Endpoint protection and anti-malware solutions
- Staff confidentiality agreements and ongoing security awareness training
- Secure backup, disaster recovery, and data restoration procedures
- Business continuity and incident response arrangements
- Physical security controls for facilities, equipment, and information assets
- Periodic review and testing of security controls to ensure their continued effectiveness.

10. Your Rights

Subject to the Nigeria Data Protection Act (NDPA), 2023, and other applicable laws, you have the following rights regarding your personal data:

- The right to be informed about how your personal data is collected, used, and disclosed.

- The right to access the personal data we hold about you.
- The right to request the correction or update of inaccurate, incomplete, or outdated personal data.
- The right to withdraw your consent at any time where processing is based on your consent.
- The right to request the deletion or erasure of your personal data where legally permissible.
- The right to object to the processing of your personal data in certain circumstances.
- The right to request the restriction of processing where applicable.
- The right to request the portability of your personal data, where technically feasible and legally applicable.
- The right to request a review of decisions based solely on automated processing, where applicable.
- The right to lodge a complaint with the Nigeria Data Protection Commission (NDPC) or any other competent regulatory authority if you believe your data protection rights have been violated.

11. Cookies

Lighthouse Capital Limited uses cookies and similar tracking technologies on its website and digital platforms to enhance functionality, improve security, analyse website usage, and provide a better user experience. Cookies may be used to:

- Improve website performance and functionality.
- Remember your preferences and settings.
- Authenticate users and maintain secure sessions.
- Analyse website traffic and user behaviour.
- Enhance the security of our digital platforms.
- Personalise content and improve customer experience.
- Support system administration, troubleshooting, and performance monitoring.

12. Marketing Communications

Lighthouse Capital Limited may send you marketing and promotional communications about our products, services, events, and other relevant information where permitted by applicable law and, where required, with your prior consent.

Marketing communications may be delivered through email, SMS, telephone, mobile applications, or other authorised communication channels. You have the right to opt out of receiving marketing communications at any time by using the unsubscribe option provided in the communication or by

contacting the Company.
Your decision to opt out of marketing communications will not affect the delivery of essential service, transactional, security, or regulatory communications relating to your account, investments, or our legal and regulatory obligations.

13. Children's Privacy
Lighthouse Capital Limited's services are not intended for persons under the age of eighteen (18), except where permitted by law or through a parent, legal guardian, or other authorised representative. Where we process a child's personal data, we do so in accordance with the Nigeria Data Protection Act (NDPA), 2023, and other applicable laws and regulations.

14. Third-Party Websites
Our website and digital platforms may contain links to third-party websites or services for your convenience. Lighthouse Capital Limited is not responsible for the privacy practices, content, or security of such third-party websites. We encourage you to review their privacy policies before providing any personal information.

15. Changes to this Privacy Policy
Lighthouse Capital Limited may amend this Privacy Policy from time to time to reflect changes in applicable laws, regulations, business operations, or technology. Any updates will be published on our website with the revised effective date. Continued use of our products or services after such updates constitutes acceptance of the revised Privacy Policy.

16. Contact
Lighthouse Capital Limited
Address: 2nd Floor, 39 Adeola Odeku Street, Victoria Island, Lagos, Nigeria
Telephone: 0201 271 8910, 0909-090-8084, 0909-090-8085
Email: info@lighthousecapital.ng
The Company will acknowledge and respond to privacy-related enquiries and requests within the timelines prescribed by applicable data protection laws and regulations.