



DATA PRIVACY POLICY

1. About this Policy

- 1.1 This policy explains when and why we collect personal information about our shareholders, investors and staff, how we use it and how we keep it secure and their rights in relation to it.
- 1.2 We may collect, use and store your personal data, as described in this Data Privacy Policy and as described when we collect data from you.
- 1.3 We reserve the right to amend this Data Privacy Policy from time to time without prior notice. We may be required to amend this Data Privacy Policy due to regulations. For any significant changes you will be notified but you are advised to check our website for the latest Privacy Policy.
- 1.4 We will always comply with the Nigeria Data Protection Regulation (**NDPR**) when dealing with your personal data. For the purposes of the NDPR, we will be the “controller” of all personal data we hold about you.

2. Who are we?

We are AVA Capital Group. We can be contacted at:

3, Glover road, Ikoyi, Lagos, Nigeria.

dpo@avacapitalgroup.com

Tel: +234 907 662 9963



3. What information we collect and why.

| Which information | What we do | Why we do it | Retention time <i>How long do we keep your information</i> |
|---|--|--|---|
| Clients Biodata such as but not limited to: Name, Date of Birth, Biometrics, Passport Photograph, Phone number, Account Details, Clearing House Number etc. | <ul style="list-style-type: none"> ● Complete a task ● Provide a service | To comply with legal and regulatory obligations and requirements | For as long as it is necessary to comply with AVA Capital Group obligations and statutory functions |
| Staff Records such as but not limited to: Name, Date of Birth, Academic Qualifications, Passport Photograph, Account Details etc. | <ul style="list-style-type: none"> ● Complete a task ● Provide a service | To comply with legal and regulatory obligations and requirements | For as long as it is necessary to comply with AVA Capital Group obligations and statutory functions |
| Service Providers Details such as but not limited to: CAC documents, PENCOM Details, Tax Identification Number, Account Details etc. | <ul style="list-style-type: none"> ● Complete a task ● Provide a service | To comply with legal and regulatory obligations and requirements | For as long as it is necessary to comply with AVA Capital Group obligations and statutory functions |

4. How we protect your personal data

- 4.1 We will not transfer your personal data outside Nigeria without your consent.
- 4.2 We have implemented generally accepted standards of technology and operational security in order to protect personal data from loss, misuse, or unauthorised alteration or destruction.
- 4.3 Please note however that where you are transmitting information to us over the internet this can never be guaranteed to be 100% secure.



- 4.4 For any payments which we receive from you on-line, we will use a recognised on-line secure payment system.
- 4.5 We will notify you promptly in the event of any breach of your personal data which might expose you to serious risk.

5. **Who else has access to the information you provide us?**

- 5.1 We will never sell nor share your personal data with any third parties without your prior consent (which you are free to withhold) except where required to do so by law.
- 5.2 We may pass your personal data to third parties who are service providers, agents and subcontractors to us for the purposes of completing tasks and providing services to you on our behalf (e.g. to print newsletters and send you mailings). However, we will disclose only the personal data that is necessary for the third party to deliver the service and we have a contract in place that requires them to keep your information secure and not to use it for their own purposes.

6. **How long do we keep your information?**

- 6.1 We will hold your personal data on our systems for as long as you are our client, service provider and staff, and for as long as is necessary to comply with our legal obligations. We will review your personal data every year to establish whether we are still entitled to process it. If we decide that we are not entitled to do so, we will stop processing your personal data except that we will retain your personal data in an archived form in order to be able to comply with future legal obligations e.g. compliance with tax requirements and exemptions, and the establishment exercise or defence of legal claims.
- 6.2 We will securely destroy all financial information once we have used it and no longer have need it.

7. **Your Rights**

- 7.1 You have rights under the GDPR:
 - (a) to access your personal data
 - (b) to be provided with information about how your personal data is processed
 - (c) to have your personal data corrected
 - (d) to have your personal data erased in certain circumstances



- (e) to object to or restrict how your personal data is processed
- (f) to have your personal data transferred to you or to another business in certain circumstances.

7.2 You have the right to take any complaints about how we process your personal data

to the National Information Technology Development Agency (NITDA):

dpo@nitda.gov.ng

For more details, please address any questions, comments and requests regarding our data processing practices to our Data Protection Officer via dpo@avacapitalgroup.com