

PRIVACY NOTICE

Introduction

Personal information is as important to us as it is to you, At FSDH HOLDCO Holding Company Limited (“FSDH HOLDCO”) we are committed to protecting your information. By ‘your information’ we mean any information provided to us by you or a third party. We will only process information where we have obtained your explicit consent or are otherwise lawfully permitted to do so.

The purpose of this Privacy Notice is to explain how personal information is collected and processed in connection with our business. “Personal information” means information about a living individual who can be identified from that information (either by self or when it is combined with other information). We may update our Privacy Notice from time to time. When we do we will communicate any changes to you and publish the updated Privacy Notice on our website. We would encourage you to visit our website regularly to be aware of the purposes for which we process your information and your rights to control how we process it.

This privacy notice (the “Privacy Notice” or “this notice”) relates to all personal information processing activities carried out by FSDH HOLDCO. FSDH HOLDCO is a data processor of personal information collected and processed for our business (including the products and services that we provide). In this notice, references to “we”, “us” or “our” refers to FSDH HOLDCO while “you” and “your” means any business customer or partner (which includes suppliers or other organisations we do business with). In the case where an account, product or service has more than one holder, owner or signatory, “you” or “your” can refer to any, both or all of you.

Our principal address is 1/5 Odunlami St, Lagos Island, Lagos and our contact details can be accessed on our official website; www.fsdhgroup.com

Information Processed

We collect and process various categories of personal information at the start of, and for the duration of, your relationship with us. We will restrict the collection and processing of information to information necessary to achieve one or more legitimate purposes as identified in this notice. Personal information may include:

- Basic personal information, including name and address, date of birth and contact details
- Financial information, including account and transactional information and history
- Information about your family, lifestyle and social circumstances (such as dependents, marital status, next of kin and contact details)
- Information about your financial circumstances, including personal wealth, assets and liabilities, Proof of income and expenditure, credit and borrowing history and needs and goals
- Education and employment information
- Goods and services provided

- Visual images and personal appearance (such as copies of passports or CCTV images)
- Online profile and social media information and activity, based on your interaction with us and our websites and applications, including for example, your profile and login information, internet Protocol (IP) address, smart device information, location coordinates, online and security authentication, mobile phone network information, searches, site visits and Spending patterns

Information Collected

We may collect personal information about you (or your business) from affiliates and any of these sources:

- Information you give to us through our various touchpoints (i.e. website, Paper Forms, etc.)
- Information that we gather from publicly available sources, such as the press, company registers and online search engines
- Information that we receive from third parties — third parties who provide services to you or us, credit reference, fraud prevention or government agencies, and other banks
- Information that we learn about you when you use our services
- Information that we gather from the technology which you use to access our services (for example location data from your mobile phone, or an IP address or telephone number) and how you use it (for example pattern recognition)

Your Rights

Subject to applicable laws, reputations and/or banking industry guidelines, you have the following rights:

- To request a copy of the personal data processed in relation to you
- To request that we correct your personal data
- To request us to delete your personal data, for example if we no longer have a valid reason to process it
- To object to how we process your personal data
- To restrict how your personal data is processed in certain cases, such as when the accuracy of your Personal Data is contested
- To request a copy of the personal data you have given to us in a machine readable format

Information Usage

We may use the information we collect from you when you register, subscribe for a product or service, sign up for our newsletter, respond to a survey or marketing communication, surf the website, provide account details at our physical locations or use other site features in the following ways:

- To manage our relationship with you or your business
- To manage and provide treasury and investment products and services
- To communicate with you about our products and services
- Personalize your experience
- To manage how we work with other companies that provide services to us and our customers



- Transaction processing and customer profiling
- Being efficient about how we fulfill our legal and contractual duties
- To detect, investigate, report, and seek to prevent financial crime
- To manage risk for us and our customers
- To run our business in an efficient and proper way. This includes managing our financial position, business capability, planning, adding and testing systems and processes, managing communications, corporate governance, and audit

Information sharing

We will share your personal information if and only if there is a legal basis for doing so. We will NOT disclose your personal information to anyone except:

- Consent is provided
- Required by law
- Required by court orders or legal process
- Violation of any part of our Privacy Notice
- Third parties conducting business on our behalf. These parties process such information for specific and limited purposes, in compliance with the privacy notice and any other appropriate confidentiality and security measures

Sensitive personal data (also known as Special categories of personal data) make up information we collect from you. In particular, we may process, biometric data, for services that require it. We process such sensitive personal data when you have provided your consent or otherwise required by applicable law and these information will be collected and processed only for the particular purposes and activities for which the information is provided.

Information Retention

FSDH HOLDCO will retain the information provided based on the nature of activity, the type of record, product or service, applicable legal and regulatory requirements. The retention period may be changed. We will keep your personal data for as long as we have a relationship with you. Once our relationship with you has come to an end (e.g. following closure of your account or following a transaction), or your application for a product is declined or you decide not to go ahead with it, we will only retain your personal data for a period of time that is, depending on the type of personal data, and the purposes for which we hold that information. Also, the retention period will be in line with the requirements of regulatory bodies in Nigeria.

Information Protection

We implement a variety of security measures to maintain the safety of your personal information. Any data (including personal information) will be collected and stored on secure file servers.

Why We Collect Your Data (Legal Basis)

S/N	Lawful Basis	Description
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1	Performance of a contractual agreement	Processing of personal data is necessary for the performance of a contract to which the individual is a party or for the company to take pre-contractual steps at the request of the individual. E.g. To provide and manage the financial services to the customer.
2	Fulfilment of a legitimate interest	Processing is necessary under the legitimate interest of the company, unless these interests are overridden by the individual's interests or fundamental rights. E.g. Sending customer details to a credit bureau in order to make an informed credit decision. Validating KYC details
3	Consent of the data subject	The individual has given their consent to the processing of their personal data.
4	Processing in the public interest	Processing of personal data is necessary for the performance of a task carried out in the public interest or in the exercise of official authority. E.g. Processing data based on law enforcement agency's request
5	Compliance with a legal obligation	Processing of personal data is necessary for compliance with a legal obligation to which the company is subject to. E.g. Data is processed as a requirement of regulatory authority
6	Protection of a vital interest	Processing of personal data in order to protect the vital interests of the data subject or another individual. "Vital interests" will include interests essential for the life of the data subject or another individual. It applies if it's necessary to process personal data to protect someone's life. E.g in case of memory loss.

Cookies

Cookies are small text files containing information which your computer or mobile device downloads when you visit a website, return to websites — or visit websites that use the same cookies — they recognize these cookies and therefore your browsing device. We do not store confidential or sensitive personal information in cookies.

To find out more about how we use cookies and what benefits they bring, please take a few moments to read this Cookie Policy.

Why and How We Use Cookies on Our Website

We use cookies to improve your online activity session by making navigation easier and providing important security features.

We use Google Analytics to collect the following types of information from users who have JavaScript enabled on their browser:

- Web browser used — software manufacturer, and version number
- Operating system
- Screen colours
- JavaScript support
- Flash version
- Screen resolution
- Network location and IP address may include
 - geographic data
 - Hostname
 - Connection bandwidth

- Time of visit
- Pages visited and dwell time on these pages
- Referring site
 - The referring website URL
 - Search engine query used

Google Analytics data is shared with Google. For more information on Google’s Privacy Policies, visit <https://policies.google.com/privacy>.

Cookie Category

Some cookies are needed to make our website work, but we need your consent to use others. The cookie categories are;

Category	Description	Cookie Name
Strictly Necessary	These cookies are needed to run our website, to keep it secure, and to obey regulations that apply to us. These cookies will still be collected even if customer declines to the collection of cookies.	
Functional	These cookies remember your region or country, language, accessibility options and your settings.	
Performance	These cookies tell us how customers use our website. We study and profile this data to help us improve our products and performance	
Marketing	These cookies help us decide which products, services and offers may be relevant for you. We may use this data to tailor the ads you see on our own and other websites and apps.	

We do not use third party cookies on our website.

What are your choices regarding cookies?

You can choose to have your computer warn you each time a cookie is being sent, or you can choose to turn off all cookies. This can be done in your browser settings. Since browsers differ, we recommend that you access the Help Menu to learn the correct way to modify your cookies.

If you turn your cookies off, some of the features that make your site experience more efficient may not function properly.

Where you can find more information about cookies

You can learn more about cookies at <http://www.allaboutcookies.org/>

Changes to This Privacy Notice

Based on the changing nature of privacy laws, user needs and our business, this privacy notice may be updated from time to time. Any change to our Privacy Notice will be communicated on our website, and this will be effective as soon as published. Accordingly, we encourage periodic reviews of this Privacy Notice for awareness of any changes that may have occurred.

Consent

We will provide you with our privacy policy whenever we are collecting your personal information irrespective of the medium being used. Your consent will be obtained by asking you to click on a button to show acknowledgement of the policy if the medium being used to collect your personal



information is in an electronic format. If your personal information is being collected through a paper document we will ask you to sign off on the document showing your understanding of our privacy policy.

Contact us

FSDH HOLDCO is committed to resolving your privacy complaints and concerns as quickly as possible. If you have a concern, complaint or questions regarding this Privacy Notice, or you are concerned about an alleged breach of privacy law or any other regulation by FSDH HOLDCO, you may contact us through the following means: at our Head office at 1/5 Odunlami St, Lagos Island, Lagos and at any of our branches in Abuja and Port Harcourt. Our Data Protection Officer will investigate your complaint and give you information about how it will be handled.

Email us at: contact@fsdhgroup.com

Call us: 234-1-2702880-2

Or write us: "The Data Protection Officer" UAC House, 1/5 Odunlami Street, Lagos Island, Lagos State, Nigeria.

You also have the right to complain to the data protection authority in Nigeria – NDPC, or refer the matter to a court of competent jurisdiction or as specified in any applicable engagement agreement with FSDH HOLDCO.

Website Address: <https://ndpc.gov.ng/>

Signed by: Management