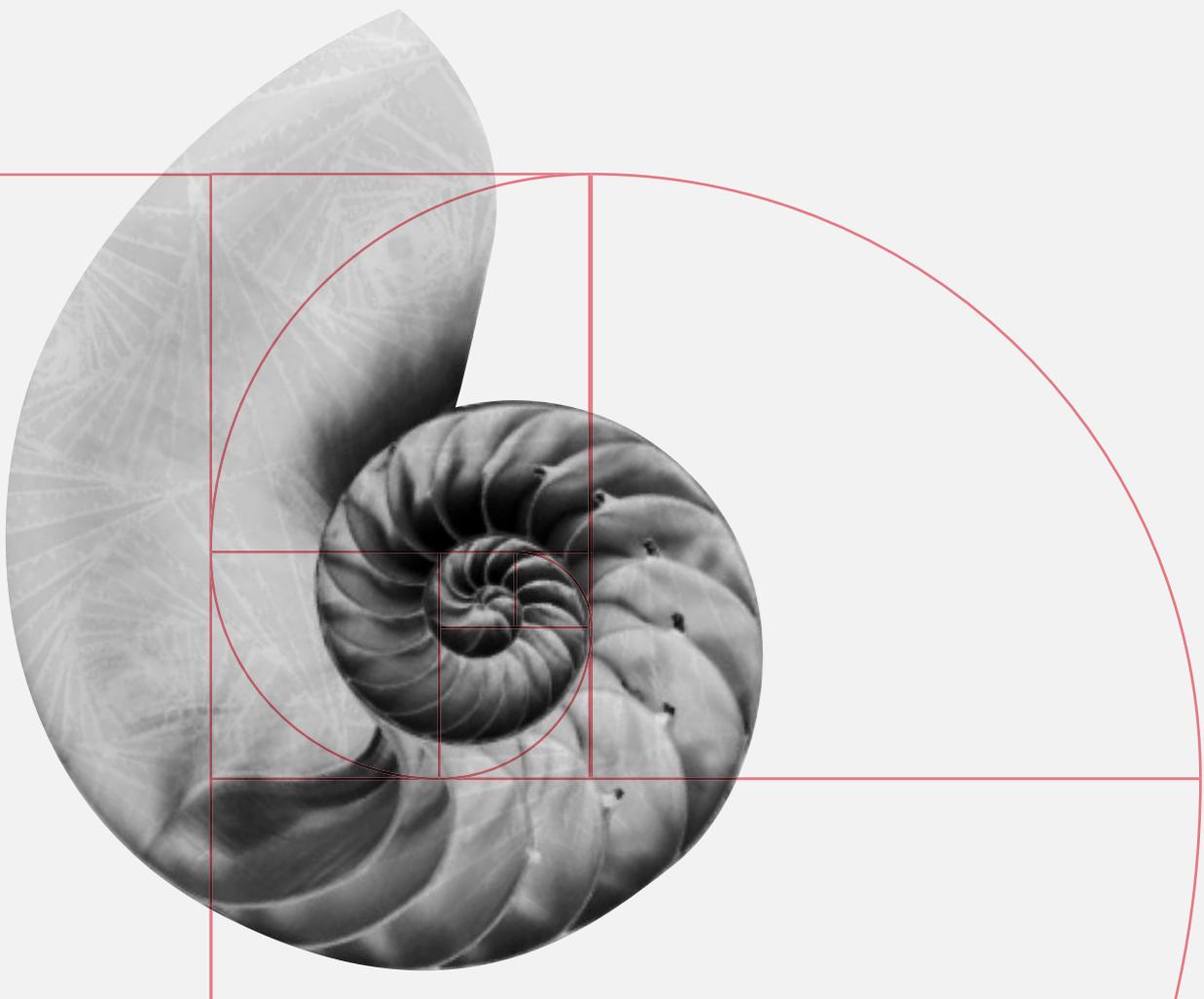


Data Privacy Policy. *2019*



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Introduction.

This Privacy Policy clearly sets out Cordros Capital Limited's (Cordros) plan of action when it comes to protecting your privacy and any information that you give Cordros when you use this website.

Cordros respects your privacy and takes the protection of personal data very seriously. If we ask you to disclose any information which we can use to identify you when using this website, you can be rest assured that it will only be used in accordance with this Privacy Policy.

Our Company is part of the Cordros Group which includes Cordros Capital Limited, Cordros Securities Limited and Cordros Asset Management Limited.

Applicable Law.

This Website is hosted, maintained and controlled in the Federal Republic of Nigeria and as such you agree that the laws of the Federal Republic of Nigeria and the jurisdiction of the Nigerian courts govern this Privacy Policy, any disclaimers, copyright and statements contained on the Website, and any legal matter resulting from the use or inability to use this Website, without regard to conflict of laws principles. Notwithstanding the foregoing, Cordros may seek recourse in any jurisdiction outside Nigeria in order to prevent the unlawful use of any of the material contained on the Website.

This Privacy Policy has been updated to comply with the Nigerian Data Protection Regulation 2019, issued by the National Information Technology Development Agency (NITDA), and has also taken into consideration the European Union's General Data Protection Regulation (GDPR).

Data collected by Cordros.

Personal Data for the purpose of this Policy includes the following:

- Information that we collect automatically when you visit our website or any of our online portals directly linked to our website;
- Information collected upon registration or subscription for our products or services;
- Information collected on onboarding (opening a new customer account with Cordros) and submission; and
- Information that you provide/disclose to Cordros voluntarily.

Personal Data does not include the following:

- Information that was disclosed anonymously, making it hard to identify a specific person;
- Information that has been permanently de-identified such that it does not relate or cannot be traced back to you specifically;
- Non-personal information collected and compiled by Cordros; and
- Information which you have provided voluntarily in an open public environment or forum, thereby making such information no longer confidential.

Some of the data Cordros may collect and process, depending on the nature of services required by you and applicable regulations, include:

Personal Identification Information –

This includes name, date of birth, identification number issued by any statutory or regulatory agency.

Contact Information –

This includes email address, phone number.

Place of residence -

Includes your physical house address and postal address.

Demographic Information -

Gender, marital status, and sensitive demographic information (ethnicity, nationality)

Financial Information -

Bank account details and bank verification number

Employment Information -

Job designation, name of employer, employer's industry and occupation.

Information on affiliation with government or politics

Cordros will not collect any personal information about you from your browsing of the Website unless you agree to the collection and use of your personal data. The personal information we collect may be captured from a variety of sources, which include, but are not limited to voluntary submissions (e.g., responses to surveys, requests for information on our products or those of our marketing partners or research reports) and review of site usage patterns.

When you become a client of Cordros, enter into a contract or agreement with us for our services or products, you may be asked to submit personal information about yourself or company in order to access our services or products, conclude contracts and enable administration and management of such services or products. Cordros 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.

Use of data collected by Cordros.

Any personal data collected by Cordros will be used in the following ways:

- In the course of administration;
- To tailor our services and products to match your investment needs;
- To conduct market research surveys;
- for statistical analysis to determine site usage;
- To run competitions and for direct marketing purposes relating to our business.
- Statutory and regulatory reporting

The services of third parties may be employed to help us in certain areas, such as website hosting, marketing and market research. In some cases that third party may receive your information. However, at all times we will endeavor to keep control and be responsible for the use of your information, and ensure that the third parties are bound by confidentiality obligations.

By providing Cordros with your personal data, you consent to our transferring of your information to third parties, countries or jurisdictions which may not provide the same level of data protection as us. However, if we make such a transfer, we will, if appropriate, put a contract in place that imposes confidentiality obligations on our counterparties to protect your information. Each time you provide us with personal information we strive to let you know how we intend to use it and ask you to give your consent to such use.

Data Security and protection.

Personal Data collected will be kept secured for as long as is reasonably necessary under the circumstances you are registered or use the Website or, or for as long as you use the service or product that you are subscribed to, unless you have provided us with your consent to use the data for any additional purposes. We take the security of the Website, our online portals and the information you provide very seriously and we will take all appropriate technical measures using recognized security procedures and tools in accordance with good industry practice to protect your personal information.

We have reasonable security measures in place to protect against the loss, misuse and interception by third parties of the information under our control, but, to the extent allowed by law, however, Cordros assumes no liability for any damages you may suffer as a result of interception, alteration or misuse of information transmitted over the Internet. Whilst we use all reasonable endeavors to protect your security in the manner described above, we consider that it is only appropriate to advise users that data transmission over the Internet and the World Wide Web cannot be guaranteed as fully secure, and therefore you use the Website and online portals at your own risk.

Our website may contain links to other websites. Our privacy policy applies only to our website, so if you click on a link to another website, you should read their privacy policy.

Use of Cookies.

Cookies are text files which ask for permission to be placed on your computer's hard drive to collect standard Internet log information and visitor behavior information. Once you agree, the file is added and the cookie helps analyze web traffic or lets you know when you visit a particular site. When you visit our websites, we may collect information from you automatically through cookies or similar technology.

Cookies allow web applications to respond to you as an individual. The web application can tailor its operations to your needs, likes and dislikes by gathering and remembering information about your preferences. Cookies are features included in your browser and will store small amounts of data on your computer about your visit to the Website, in particular when you complete any form on the website. However, a cookie does not provide us with any personal information.

Therefore, if you have not supplied us with any personal information, you can still browse our site anonymously. You do not need to have cookies turned on to visit most of the Website. our site anonymously. You do not need to have cookies turned on to visit most of the Website.

Cookies on our Website are not used to capture or store personal data from browsers to the site, other than to log your IP address and session information such as the duration of the visit to our site and the nature of the browser used. This information is used only for administration of the site system and in the compilation of statistics used by Cordros. Cookies may be required for you to gain access and participate in specific areas of the Website. Once you have closed your browser, this type of cookie is deactivated.

You can set your browser not to accept cookies. However, in a few cases, some of our website features may not function as a result.

Below are some of the things our website uses cookies for:

Functionality

Cordros uses cookies so that we recognize you on our website and remember your previously selected preferences. These could include what language you prefer and location you are in. A mix of first-party and third-party cookies may be used.

Advertising

Cordros uses cookies to collect information about your visit to our website, the content you viewed, the links you followed and information about your browser, device, and your IP address. Our Company sometimes shares some limited aspects of this data with third parties for advertising purposes.

How we store data.

Cordros securely stores your data on our servers (both onsite and off-site) and in the cloud, and our systems and networks are firewall protected. We also ensure that data is secured with end to end encryption.

What are your data protection rights?

Cordros would try to ensure you are fully aware of all of your data protection rights. Every user is entitled to the following:

The right to access -

You have the right to request for copies of your personal data which was given to us by you.

The right to rectification -

You have the right to request that Cordros corrects any information you believe is inaccurate or contrary to information provided by you. You also have the right to request that we complete the information you believe is incomplete.

The right to erasure -

You have the right to request that we erase your personal data at any time, under certain conditions.

The right to restrict processing -

You have the right to request that we restrict the processing of your personal data, under certain conditions.

The right to object to processing -

You have the right to object to the processing of your personal data, under certain conditions.

The right to data portability -

You have the right to request that Cordros transfers the data that we have collected from you to another organization, or directly to you, under certain conditions.

Control of personal information.

Whenever you are asked to fill a form on the Website or any of our online portals, you may choose to look for the box that you can click to indicate that you do not want the information to be used by anybody for direct marketing purposes. We will not disclose, sell, distribute or lease your personal information to third parties unless we have your permission or are required by law to do so. If you have previously agreed to us using your personal information for direct marketing purposes, you may change your mind at any time by writing to or emailing us at itsupport@cordros.com. Please note that it may take some time for us to update our records to ensure your new choices are respected.

Policy and website update.

Cordros may update this Privacy Policy from time to time to the extent permitted by law, and you are responsible for periodically reviewing the most current version on the Website. To the extent allowed by law, your continued use of our Website will be deemed your conclusive acceptance of the updated Privacy Policy. Cordros reserves the right to change or delete any information, features or content of the pages of the Website at any time and without notice. Information, features or content for which you have paid for or subscribed to and are required to pay any consideration, Cordros will use its reasonable endeavors to exercise this right on notice to you.

Cordros keeps its privacy policy under regular review and places any updates on this website. This privacy policy was last updated on **20th August, 2019.**

Links.

Cordros' website may contain links to other websites of interest or any of our online portals; however, once you have used these links to leave our site, you should note that Cordros does not have any control over the other website. Cordros does not endorse these sites, its sponsors or any of the policies, activities, products or services offered on these sites or by any advertiser on these sites.

Therefore, Cordros cannot be responsible for the protection and privacy of any information which you provide whilst visiting such sites and such sites are not governed by this privacy statement. This Privacy Policy applies only to information collected by this Website. Please be aware that Cordros is not responsible for the privacy policies of other sites and as such, Cordros would advise you to read the privacy statement of any website that collects personal information from you.

Contact Details.

If you have any questions about Our Company's privacy policy, the data we hold on you, or you would like to exercise any of your data protection rights, please do not hesitate to contact us.

Email us at:

info@cordros.com

Call us:

01-9049041-2

Or write to us at:

**70 Norman Williams Street,
Awolowo Ikoyi, Lagos.**

Information on this website is provided "as is" without warranty of any kind, either express or implied, including, but not limited to, the implied warranties of merchantability, fitness for a particular purpose, or non-infringement. Some jurisdictions do not allow the exclusion of implied warranties, so the above exclusion may not apply to you.