

PRIVACY NOTICE

1. Scope

All data subjects whose personal data is collected, in line with the requirements of the Nigeria Data Protection Regulation.

2. Responsibilities

2.1. The Data Protection Officer is responsible for ensuring that this notice is made available to data subjects prior to Pivot Capital Limited collecting/processing their personal data.

2.2. All Employees/Staff of Pivot Capital Limited who interact with data subjects are responsible for ensuring that this notice is drawn to the data subject's attention and their consent to the processing of their data is secured.

3. Privacy notice

3.1. Pivot Capital Limited has an established reputation for providing financial market services to business enterprises, government (all tiers) and high net worth individuals of a very high standard in terms of service delivery, professionalism and integrity.

Our assigned Data Protection Officer **Mr. Olatunji Olawale** can be contacted directly via:

Website: www.pivotcapitaltd.com

Email: dpo@pivotcapitaltd.com

Address:

Investment House Annex, 3rd Floor, 21/25 Broad Street P.O. Box 804, Lagos

Tel: 01-4540934

3.2. Consent

By consenting to this privacy notice you are giving us permission to process your personal data specifically for the purposes identified.

Consent is required for Pivot Capital Limited to process both types of personal data, but it must be explicitly given. Where we are asking you for sensitive personal data we will always tell you why and how the information will be used.

You may withdraw consent at any time by contacting us at the details provided or in line with Withdrawal of Consent Procedure.

3.3. Disclosure

Pivot Capital Limited will not pass on your personal data to third parties without first obtaining your consent. We do not share your personal data without first obtaining your consent.

3.4. Retention period

Pivot Capital Limited will process personal data for the purposes of your enquiry and store information in line with statutory obligations and our cookie policy. Settings that enable our products to operate correctly or maintain preferences maybe stored on your device to assist you when returning to our site. Wherever possible personal data will be minimized and securely destroyed. Storage of personal data will follow statutory retention requirements.

3.5. Your rights as a data subject

At any point while we are in possession of or processing your personal data, you, the data subject, have the following rights:

- Right of access – you have the right to request a copy of the information that we hold about you.
- Right of rectification – you have a right to correct data that we hold about you that is inaccurate or incomplete.
- Right to be forgotten – in certain circumstances you can ask for the data we hold about you to be erased from our records.

- Right to restriction of processing – where certain conditions apply to have a right to restrict the processing.
 - Right of portability – you have the right to have the data we hold about you transferred to another organisation.
 - Right to object – you have the right to object to certain types of processing such as direct marketing.
 - Right to object to automated processing, including profiling – you also have the right to be subject to the legal effects of automated processing or profiling.
- Right to judicial review: in the event that Pivot Capital Limited refuses your request under rights of access, we will provide you with a reason as to why. You have the right to complain as outlined in clause 3.6 below.
- All of the above requests will be forwarded on should there be a third party involved in the processing of your personal data.

3.6. Complaints

In the event that you wish to make a complaint about how your personal data is being processed by Pivot Capital Limited (or third parties as described in 3.4 above), or how your complaint has been handled, you have the right to lodge a complaint directly with the supervisory authority and Pivot Capital Limited data protection representative the assigned Data Protection Officer / NDPR Owner, details as in 3.1.

3.7. On-line privacy statement

3.7.1. Personal data

Under the Nigeria Data Protection Regulation (NDPR) personal data is defined as: “any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an on-line identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person”.

3.7.2. How we use your information

This privacy notice tells you how we, Pivot Capital Limited, will collect and use your personal data. We acquire and use information relating to commercial organisations and individuals for a variety of reasons:

1. Delivery of our services
2. Communications
3. Legal obligations
4. Marketing purposes

If you are requested to provide us with personal information you can of course refuse. If you choose not to provide the data that we require to provide our services then we may not be able to deliver that service for you.

3.7.3. The personal data collected from you

Contact data: We will request your full name, postal address, phone number and e-mail address.

Special category data: We may request on occasion such data about you that may be necessary to facilitate the execution of our services. This maybe data such as your current health for a vulnerability assessment.

Payment data: Where it is necessary to process your payment, if you are repaying debt or for payments of services supplied to you, then sensitive information, such as your debit card number, security code and cardholders address maybe requested but not stored by us. The payment is processed by our staff using secure processing websites with secure links operated by our approved card merchant service providers. The information is not stored on our systems or held with any of our personnel.

Business and relationships: We may collect such personal information that you provide to us relating to your contacts and business relationships.

Content: We may collect the content of any data files and communications that you may send us for the purposes of carrying out your instruction, together with any relevant

physical documents that you may give us as well, when these are necessary to provide you with the offered service. Data we collect may include but not limited:

- address, subject line and body of an email
- video and/or audio recording of a video message
- written content of a text, similar app or other content of an instant message
- relevant social media messages

We may also collect information that you provide us with regards to client feedback for services provided. This information will be retained in line with our retention policy.

The personal data we collect will be used for the following purposes but not limited to:

- To carry out our business activities
- To enforce using the appropriate legal process
- Update existing information
- Manage our products and services
- Monitor and keep records of communications
- To improve the operations of our business where possible
- To comply with legal and regulatory obligations and requirements

Our legal basis for processing personal data:

- To provide products and service
- Legitimate interests
- Vulnerability assessments
- Public interest matters
- To comply with legal and regulatory obligations and requirements

Any legitimate interests pursued by us, or third parties we use, are as follows:

- Develop business partnerships
- To comply with legal and regulatory obligations and requirements

3.7.4. Need to collect and store personal data

In order for us to provide you with the services we offer we need to collect personal data for:

- General information processing: though we do not undertake automated decision making or profiling of personal data.
- Legitimate Business requirements
- Perform contractual and payment obligations
- Meet legal obligations and requirements

In any event, we are committed to ensuring that the information we collect and use is appropriate for this purpose, and does not constitute an invasion of your privacy. In terms of being contacted for marketing purposes Pivot Capital Limited would contact you for additional consent.

3.7.5. Sharing personal data

Any third parties that we may share your data with are obliged to keep your details securely, and to use them only to fulfil the service they provide you on our behalf. When they no longer need your data to fulfil this service, they will dispose of the details in line with Pivot Capital Limited procedures. If we wish to pass your sensitive personal data onto a third party we will only do so once we have obtained your consent, unless we are legally required to do otherwise.

3.7.6. Use of personal data

Pivot Capital Limited will process (collect, store and use) the information you provide in a manner compatible with the Nigeria Data Protection Regulation (NDPR). We will endeavour to keep your information accurate and up to date, and not keep it for longer than is necessary. Personal data may be held in addition to these periods depending on individual business needs.

3.7.7. The personal data that Pivot Capital Limited holds about you

If Pivot Capital Limited does hold personal data about you, you can request the following information:

- Identity the contact details of the person or organisation that has determined how and why to process your data.
- Contact details of the data protection officer, where applicable.
- The purpose of the processing as well as the legal basis for processing.
If the processing is based on the legitimate interests of Pivot Capital Limited or a third party, information about those interests.
- The categories of personal data collected, stored and processed.
- Recipient(s) or categories of recipients that the data is/will be disclosed to.
- If we intend to transfer the personal data to a third country or international organisation, information about how we ensure this is done securely.
- The National Information Technology Development Agency (NITDA) has approved sending personal data to some countries because they meet a minimum standard of data protection. In other cases, we will ensure there are specific measures in place to secure your information.
- How long the data will be stored.
- Details of your rights to correct, erase, restrict or object to such processing.
- Information about your right to withdraw consent at any time.
- How to lodge a complaint with the supervisory authority.
- Whether the provision of personal data is a statutory or contractual requirement, or a requirement necessary to enter into a contract, as well as whether you are obliged to provide the personal data and the possible consequences of failing to provide such data.
- The source of personal data if it wasn't collected directly from you.
- Any details and information of automated decision making, such as profiling, and

any meaningful information about the logic involved, as well as the significance and expected consequences of such processing.

3.7.8. What forms of ID will I need to provide in order to access this?

Pivot Capital Limited accepts:

Passport Photograph

National ID Card

Driver's License

Voter's card (Permanent)

Nigerian International passport

4. Cookie Policy

Our website does use cookies for the purposes of analytics. A detailed outline of cookies is listed below:

4.1. About cookies

A cookie is a file containing an identifier (a string of letters and numbers) that is sent by a web server to a web browser and is stored by the browser. The identifier is then sent back to the server each time the browser requests a page from the server.

Cookies may be either "persistent" cookies or "session" cookies: a persistent cookie will be stored by a web browser and will remain valid until its set expiry date, unless deleted by the user before the expiry date; a session cookie, on the other hand, will expire at the end of the user session, when the web browser is closed.

Cookies do not typically contain any information that personally identifies a user, but personal information that we store about you may be linked to the information stored in and obtained from cookies.

4.2. Cookies that we do and do not use

We do and do not use cookies for the following purposes:

(a) authentication - we do not use cookies to identify you when you visit our website and as you navigate our website

(b) status - we do not use cookies to help us to determine if you are logged into our website

(c) personalisation – we do not use cookies to store information about your preferences and to personalise the website for you

(d) security - we do not use cookies, as an element of the security measures used to protect user accounts, including preventing fraudulent use of login credentials, and to protect our website and services generally, as we do not have these credentials located anywhere

(e) advertising - we do not use cookies to help us to display advertisements that will be relevant to you

(f) analysis - we do use cookies to help us to analyse the use and performance of our website and services. Cookies used for this purpose are listed in the table below

(g) cookie consent - we do use cookies to store your preferences in relation to the use of cookies more generally.

4.3. Cookies used by our service providers

Our service providers use cookies and those cookies may be stored on your computer when you visit our website.

We use Google Analytics to analyse the use of our website. Google Analytics gathers information about website use by means of cookies. The information gathered relating to our website is used to create reports about the use of our website. Google's privacy policy is available at: <https://www.google.com/policies/privacy/>.

4.4. Managing cookies

Most browsers allow you to refuse to accept cookies and to delete cookies. The methods for doing so vary from browser to browser, and from version to version. You can however obtain up-to-date information about blocking and deleting cookies via these links:

- <https://support.google.com/chrome/answer/95647?hl=en> (Chrome);
- <https://support.mozilla.org/en-US/kb/enable-and-disable-cookies-websitepreferences> (Firefox);
- <http://www.opera.com/help/tutorials/security/cookies/> (Opera);

- <https://support.microsoft.com/en-gb/help/17442/windows-internet-explorerdelete-manage-cookies> (Internet Explorer);
- <https://support.apple.com/kb/PH21411> (Safari); and
- <https://privacy.microsoft.com/en-us/windows-10-microsoft-edge-and-privacy> (Edge).

Blocking all cookies will have a negative impact upon the usability of many websites. If you block cookies, you may not be able to use all of the features on our website.