



CAPITAL & TRUSTS LIMITED
RC 268275

DATA PRIVACY POLICY

This Privacy Policy informs you of the data we collect, why we collect it and what we do with it after collection. The controls available to you to manage your data is also available within this policy.



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INTRODUCTION

Leadway Capital & Trusts Limited is committed to ensuring that your privacy and personal information are protected. Leadway Capital & Trusts Limited is also responsible for complying with extant Nigerian and applicable international laws on data protection. This privacy policy is issued by Leadway Capital & Trusts Limited (hereinafter referred to as “we”, “our” or “us”).

Whenever we collect and process the personal information of our data subjects, we ensure it adheres to strict controls to ensure that personal data of the data subject is obtained and used in line with the company's privacy principles. We handle personal data with the greatest care and use it only for legitimate and specified business purposes under the following principles:

1. Leadway Capital & Trusts Limited respects the privacy rights of its clients and customers whose personal data are in its custody and use.
2. Leadway Capital & Trusts Limited protects personal data by implementing appropriate technical and organizational measures in our data processing operations.
3. Leadway Capital & Trusts Limited obtains personal data fairly and only uses it for legitimate business purposes.
4. Leadway Capital & Trusts Limited holds itself accountable for demonstrating compliance with applicable legal and regulatory requirements and understanding of our roles and responsibilities.
5. Leadway Capital & Trusts Limited will only retain your information for as long as necessary to fulfill purposes for its collection including the purposes of satisfying any legal, accounting, or reporting requirements after which we will promptly delete your data from all of our databases.
6. Leadway Capital & Trusts Limited shall delete your data where we no longer have use for it or where you discontinue your business relations with us.

All personal information collected by us is processed in accordance with the extant data protection laws in Nigeria.

ROLE DEFINITIONS

The following roles are defined for the purpose of this policy:

Data Subject is an identifiable person; one who can be identified directly or indirectly, in particular by reference to an identification number or to one or more factors specific to his physical, physiological, mental, economic, cultural or social identity and includes our clients and customers.

Data Administrator means a persons or organization that processes data. For the purpose of this policy, Leadway Capital & Trusts Limited is the Data Administrator.

Data Controller means a person who either alone, jointly with other persons or in common with other persons or as a statutory body determines the purposes for and the manner in which



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personal data is processed or is to be processed. For the purpose of this policy, the Managing Director is the Data Controller or whoever he so delegates.

Data Protection Officer is appointed by the data controller to ensure that the strategy and implementation of data protection requirements are in compliance with the data protection policy and the relevant extant laws.

The responsibilities of the Data Administrator, Data Controller, and Data Protection Officer are clearly outlined in the Nigeria Data Protection Regulation (2019).

SCOPE

This privacy policy applies generally to personal data processed in connection with our business. It serves to set out Leadway Capital & Trusts Limited's approach to your data.

INFORMATION PROCESSED BY LEADWAY

We collect and process the personal data of the Data Subject. Personal data refers to any information useful to Leadway Capital & Trusts Limited in performing our role. Leadway Capital & Trusts Limited may process the following:

1. Information about the data subject – for example, name, age, gender, date of birth, nationality.
2. Means of identification - date of birth, National Identity Card Number (NIN), International Passport details, Drivers' License, Voter's card details, etc.
3. Contact information – in some cases, for example, the Company may receive the data subject's email, address, and phone number.
4. Online information – for example cookies and IP address (your computer's internet address) when you interact with our online platforms (Website and App)
5. Financial information – the Company may process information related to payments the data subject makes in the context of the services provided by Leadway Capital & Trusts.
6. Contractual information – for example details about the services a data subject purchases and with whom the data subject holds them.
7. Other sensitive personal data (Health background/information, marital status, criminal history record, Biometric details, and Gender)

CONSENT

1. Where data subjects provide their consent for use of their personal information, Leadway Capital & Trusts Limited will explain the reason for obtaining the data subject's consent. Without



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such consent, we may be unable to provide the required services when they arise. Where the data subject provide personal information about third parties, Leadway Capital & Trusts Limited will ask such clients to confirm that the third party has given consent to the data subject to act on their behalf and will provide us with a copy of the consent issued.

2. Consent will be obtained via the same medium used to obtain personal information or through any other means that is acceptable to Leadway Capital & Trusts Limited. Reference will be made to this Policy or a summarized version that can be easily understood by the data subject. The data subject will be required to indicate understanding and acceptance of the terms contained in the policy. This can be via signature for physical documents or a ticked checkbox for electronic platforms.

3. Where Leadway Capital & Trusts Limited has appropriate, legitimate business needs to use client personal information for maintenance of business records including development and improvement of products and services, we will take extra care to ensure that the data subject's rights to security and confidentiality is not infringed upon.

REASON FOR COLLECTION OF DATA

Leadway Capital & Trusts Limited will obtain the consent of the data subject before use and processing of the data for one or more specific purposes made known to the data subject.

Such personal data obtained with the consent of the data subject shall not be used in any manner other than the stated purpose for which the data was obtained, except with further consent of the data subject whether at the instance of the data subject or upon our engagement with the data subject.

Leadway Capital & Trusts Limited may use data subject's personal data for a number of reasons:

1. Conducting our business with our clients
3. Assessing, improving and developing our services
4. Enhancing our knowledge of risk and investment in general
5. Fulfilling legal or regulatory obligations and protecting ourselves and our clients against fraud. Such regulators include The Securities and Exchange Commission, National Financial Intelligence Unit and such other regulatory agencies that are created from time to time.
6. Archiving purposes in the public interest, scientific or historical research purposes or statistical purposes.
7. Correspondence and marketing purposes. Your data helps us to communicate with you and provide relevant information on our products and services.
8. Customer services and dispute resolutions as regards to services provided by us.



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HOW WE STORE AND PROTECT YOUR INFORMATION

Leadway Capital & Trusts Limited applies information protection technologies including perimeter security, malware management, data loss prevention and backup & recovery. Our data centers are also protected against environmental threats. Leadway Capital & Trusts Limited's information security policies and practices apply to all personal information in the company's custody.

Leadway Capital & Trusts Limited will only transfer personal information to a third party where the company has ensured that such information is protected and the data subject's consent has been obtained. We will procure the privacy policy of the Third Party to guarantee the safeguard and protection of the personal data of the data subject in the custody of the third party. No consent shall be sought, given or accepted in any circumstance that may engender direct or indirect propagation of atrocities, hate, child rights violation, criminal acts and anti-social conducts.

METHODS OF COLLECTING PRIVATE INFORMATION

We collect the personal data of Data Subjects through the following means:

1. Direct collection:

1.1 Know Your Customer (KYC) forms

1.2 Forums and feedback forms

1.4 Enquiry and Quote forms

1.5 Recorded telephone conversations

1.6 Digital touch points

1.7 Electronics means (emails and apps)

2. Cookies on our website. We collect and process data about Data subject's IP address, internet actions and patterns when they interact with our website.

4. Third parties' data collection source.

Provided that in the case of data obtained from third party source, a copy of the data subject's consent given to the third party to transfer the data to Leadway Capital & Trusts Limited shall suffice for the company's use and processing.

LEADWAY CAPITAL & TRUSTS LIMITED'S USE OF COOKIES

Our website uses cookies to track browsing history of visitors to improve their experience. Our website provides visitors with an option to accept the use of cookies during the browsing session.



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Consent must be received before any form of data processing can be performed. Every consent given by a data subject will be kept secured as evidence that consent was received.

In the case of our customers, the data subject will provide consent by responding to a dialogue box corresponding to declarations indicating whether consent is given or declined. Such declaration will be in clear and plain language. For children's personal data, consent will be sought from their legal guardian.

SOCIAL MEDIA PLATFORMS

The data subject may wish to participate in various blogs, forums, and other social media platforms hosted by Leadway Capital & Trusts Limited ("Social Media Platforms") which are made available to the data subject. The main aim of these Social Media Platforms is to facilitate and allow the data subject share content. However, we cannot be held responsible if the data subject shares personal information on Social Media Platforms that is subsequently used, misused or otherwise appropriated by another user. The data subject is required to consult the Privacy Statements of such services before using them.

THIRD PARTY ACCESS AND PURPOSE OF ACCESS

1. Disclosure to Employees

Leadway Capital & Trusts Limited's employees have access to and process personal data based upon a "need to know" basis in order to do their job. We regularly check who has access to our systems and data.

2. Disclosures to Third Parties

Leadway Capital & Trusts Limited may disclose data subjects' personal data to these categories of third parties:

- a. Our service providers and agents e.g. IT companies who support Leadway Capital & Trusts Limited's technology, marketing agencies, research specialists, document management providers and tax advisers.
- b. The Securities and Exchange Commission (SEC) or other Regulatory Authorities
- c. Clients who provide us with data subjects' personal data.

The above disclosures to the third party shall be made only to the extent necessary for the specific purpose for which the data is provided and the third party shall be informed of the confidential nature of such information and shall be directed to keep the data subject's information strictly confidential.



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We may be obligated by law to disclose any information about the Data subject, and we may do so to law enforcement agencies and government officials as necessary or appropriate under certain circumstances. Aside from these exceptions, we do not share or disclose the personal information data subjects supply to us without their permission.

LAWFUL PROCESSING OF PERSONAL DATA

There are a number of legal grounds that may apply and the following ones are most likely to be relevant to the data subject:

1. Leadway Capital & Trusts Limited may process the personal data of the data subject when we obtain the data subject's consent or when our client obtains consent from the data subject.
2. Where the data subject has a contract with Leadway Capital & Trusts Limited, the personal data of the data subject may be processed when it is necessary in order to enter into or perform a contract.
3. Where we have a legal obligation to perform such processing, such as where Leadway Capital & Trusts Limited shares information with its regulators, law enforcement agencies or court.
4. In order to protect the vital interests of the data subject or of another natural person.
5. Where it is necessary to facilitate prevention and/or detection investigation of criminal action (including fraud) or is otherwise in the overriding public interest.
6. Where exemptions under the Data Privacy law allows Leadway Capital & Trusts Limited to disclose such information.
7. Where processing is necessary for the performance of a task carried out in the public interest or in the exercise of public mandate vested in Leadway Capital & Trusts Limited.

FOREIGN TRANSFER OF PERSONAL DATA

The transfer of data subject's personal information may be to a third party in a foreign country which has adequate data protection laws for data transfer, to be determined by the Attorney General of the Federation and the Data subject shall have the right to be informed of the appropriate safeguards for data protection in the foreign country.

Where the Attorney General of the Federation has not determined the third party country, the data subject's personal information may be transferred to a third party in a foreign country in the following circumstances:

1. Where the data subject has consented to the proposed transfer after having been informed of the possible risks of such transfers
2. The transfer is for the performance of a contract between the data subject and the data controller



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3. The transfer is for the performance of a contract concluded in the interest of the data subject between the Data Controller and another natural or legal person
4. The transfer is for public interest
5. The transfer is for the establishment exercise or defense of legal claim
6. The transfer is to protect the vital interest of the data subject or other persons, where the data subject is physically or legally incapable of giving consent.

The data subject shall have the right to be informed of the appropriate safeguards for data protection in the foreign country.

LENGTH OF TIME FOR KEEPING CLIENT PERSONAL INFORMATION

The length of time for storing data subject's personal information shall be in line with Leadway Capital & Trusts Limited's Data Retention Schedule in its Retention policy. This includes keeping the data subject's information for a reasonable period of time as stated in the Retention policy after the data subject's relationship with Leadway Capital & Trusts Limited or its client has ended and particularly for statistical analysis, pricing and risk modelling purposes.

In certain instances, we will minimize personal data; or de-identify data for use in statistical or analytical activities. This is undertaken in accordance with the data protection laws.

RIGHTS OF THE DATA SUBJECT

Data subject has the following rights in respect of our use of their personal information:

1. The Data subject has a right to a copy of their personal information as maintained by the Company
2. The Data subject has the right to rectify information which it believes to be inaccurate or incomplete.
3. In line with certain regulatory requirements, the Data subject has the right to have their information erased from our database
4. The Data subject has the right to refrain or restrict us from using his/her personal information
5. The Data subject has the right to request for the transfer of any personal information to a third party
6. The Data Subject can object to the processing of his/her personal data for the purposes of third party marketing
7. The Data subject has the right to lodge complaints, in the event that there is an objection to the manner in which his/her personal information is being used by the Company.



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The Data Controller shall communicate any rectification or erasure of personal data or restriction to each recipient to whom the data the personal data has been disclosed, unless this proves impossible or involves disproportionate effort.

In some circumstances, exercising some of these rights will mean Leadway Capital & Trusts Limited is unable to continue providing services in relation to the data subject's transaction, portfolio or assets and may therefore result in termination of the transaction. Each data subject's transaction terms and conditions set out what will occur in the event of a termination.

Some of Leadway Capital & Trusts Limited's assessment of risks are made automatically by inputting the data subject's personal information into a system, the criteria of which is determined by Leadway Capital & Trusts Limited's team and the decision is then calculated using certain automatic processes rather than manual process via discussions. We make automated decisions in the following situations:

1. Financial computation: We use the data subject's personal information to determine products, services, and related investment plans suitable for them.
2. Fraud and money laundering prevention: Leadway Capital & Trusts Limited uses automated anti-fraud and money laundering filters that check against global databases individuals known to have undertaken fraudulent and/or money laundering transactions and will reject those applicants based on outcomes of the automated checks.
3. Application assessment: Leadway Capital & Trusts Limited may use scoring methods to assess applications, perform identity verification and determine the financial capabilities of a client. If a data subject does not consent to processing sensitive information in this manner, Leadway Capital & Trusts Limited may be unable to assess the application or provide the required services. Alternatively, we may only be able to offer the data subject services that do not require Leadway Capital & Trusts Limited to have that information from the onset. The automated decision making performed by us during the application is proprietary to Leadway Capital & Trusts, and the results thereof is not shared with third parties.

Where the data subject chooses to opt out of automatic decision-making, a formal communication to that effect will suffice. However, in some situations, it may imply that we will be unable to offer the required services because automated decisions are necessary to price and provide certain products and services.

Data subjects can enforce the above rights by sending an email to **info@leadwaycapital.com**. The Data Controller is obligated to act on the request of the data subject without delay. In the event that the Data Controller does not take action on the request of the Data Subject, the Data Controller shall within one month of receipt of the request, inform the data subject of the reasons why the request has not been actioned.

The exercise of the rights listed above shall be in conformity with constitutionally guaranteed principles of Law for the general protection and enforcement of fundamental rights.



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TRAINING

Ultimately, it is Leadway Capital & Trust's employees who are the most important element of our commitment. Leadway Capital & Trust's employees are involved in every step of the data lifecycle, including sourcing and receiving personal data, processing it in compliance with laws and regulations, employing safeguards, and establishing the means and schedules of retention and deletion. It is therefore imperative that our employees understand their role and be committed to safeguarding personal data.

Leadway Capital & Trusts Limited designs its training program to be relevant, focused on the individual and also focused on concrete risks. Leadway Capital & Trusts Limited runs regular data protection and information security awareness campaigns. The Company also share with its employees other knowledge resources on data protection and privacy topics, including guidance on ways that they can better protect and safeguard personal privacy.

It is important that our employees understand the seriousness of protecting personal data and respecting privacy rights with the ability to relate this back to the risks and consequences from an individual perspective. Through Leadway Capital & Trust's efforts, it remains committed to realize its goal to ensure its employees and business partners understand their respective roles and responsibilities for data protection compliance.

MARKETING

The data subject reserves the right to the use of his/her personal information for marketing and Leadway Capital & Trusts Limited shall obtain the consent of the client prior to using such information for marketing purpose in specific cases not covered under this policy.

We shall be committed to only send our data subjects Leadway entities marketing communications that meets the needs and behaviors of the data subject. Where the data subject chooses to unsubscribe from our mailing lists, such can be achieved at any time by following the unsubscribe instructions that appear in all marketing emails or contact Leadway Capital & Trusts Limited via the details set out in this policy documents.

Periodically, Leadway Capital & Trusts Limited may run specific marketing campaigns through social media and digital advertising that the data subject may see which are based on general demographics and interests. Individual personal information is not used for these campaigns. Should a data subject not want to see such campaigns, the data subject shall be responsible for adjusting preference settings within the specific social media platform including cookie browser settings

Leadway Capital & Trusts Limited may retain any data provided on its website and mobile app for a reasonable period, subject to the client's prior approval, even if the contract is not consummated and such information may be used to make enquiry on why the contract is not consummated.



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AUDIT AND ENFORCEMENT OF THE DATA PROTECTION POLICY

The Internal Audit Department of the Company shall conduct the audit of the privacy and data protection practice, in accordance with the extant Data protection regulation and the Data Protection Officer shall be responsible for monitoring compliance with the regulation.

REMEDIES FOR VIOLATION OF DATA PROTECTION POLICY AND THE TIMEFRAME FOR REMEDY

In the event of violation of this policy, the data controller shall within 15 days redress the violation. Where the violation pertains to the disclosure of the data subject's information without his/her consent, such information shall be retracted immediately and confirmation of the retraction sent to the data subject within 48 hours of the redress.

Where the violation is caused by any representative of the data controller, such representative shall be subject to appropriate sanction.

DOWNLOAD LEADWAY DATA PRIVACY POLICY

To download a full copy of this policy in PDF format, please visit:

<https://www.leadwaycapital.com/privacy-policy>

POLICY UPDATE

There may be a need to update this policy periodically, for example as a result of government regulation, new technologies, or other developments on data protection and/or privacy laws. The current version of this policy is available on our website. Your data with us should be accurate and correct at all times. You, as the Data subject owes us a duty to provide us with your up-to-date personal data at all times.

CONTACT DETAILS OF THE DATA CONTROLLER AND DATA PROTECTION OFFICER

Leadway Capital & Trust's Data Controller and Data Protection Officer can be contacted via the following details:

Leadway Capital & Trusts Limited

121/123, Funsho Williams Avenue,



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Iponri, Surulere,

Lagos.

dpo@leadway.com