



EMERGING AFRICA CAPITAL LIMITED GROUP

PRIVACY POLICY

2021

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1. INTRODUCTION

The Privacy Policy (the “**Policy**”) is designed to enable Emerging Africa Capital Limited (the “Parent Company”) and its subsidiaries hereinafter collectively referred to as (the “**Emerging Africa Group**” or the “**Company**”) to define its structure and approach to collection, handling and processes of data of both internal and external clients. This Policy will help Emerging Africa Capital Group to explicitly describe the use of the data collected, how it will be handled, its processing and ensure transparency with all the process aforementioned. This Policy also aims to explain when and why the Emerging Africa Group collects personal information about its shareholders, clients, investors, employees and other stakeholders (collectively referred to as “**Data Subject**” or “**You**”), how the personal information is used, kept secured and the rights of the aforementioned Data Subject in relation to it.

Emerging Africa Group may collect, use and store the personal data of a Data Subject, as described in this Privacy Policy.

Emerging Africa Group reserve the right to amend this Privacy Policy from time to time without prior notice. Notwithstanding, for any significant changes the Data Subject shall be notified but You are advised to check our website for the latest Privacy Policy. Emerging Africa Group will always comply with the Nigeria Data Protection Regulation (NDPR) when dealing with the personal data of Data Subject. For the purposes of the NDPR, Emerging Africa Group will be the “controller” of all personal data we hold about you.

2. OBJECTIVES OF THIS POLICY

This Policy is aimed at ensuring the following:

- i. Providing all Data Subject, the comfortability needed in sharing their personal information.
- ii. To guide any third-party entity that intends to do business with the Emerging Africa Group on the way and manner data and information are managed
- iii. To establish trust and a transparent process with all Data Subject in the management of data and information

3. SCOPE OF THIS POLICY

This Policy shall cover the parent company, subsidiaries, third parties and stakeholders of Emerging Africa Group.

4. INFORMATION REQUIRED OR REQUESTED FROM DATA SUBJECT

information	Use	Reason	Retention time <i>How long do we keep your information</i>
Name: Surname First Name Middle Name	Complete a task Provide a service	To comply with legal and regulatory obligations (KYC) and requirements	For as long as it is necessary to comply with Emerging Africa Group obligations and statutory functions
Date of birth / age related information	Complete a task Provide a service	To comply with legal and regulatory obligations (KYC) and requirements	For as long as it is necessary to comply with Emerging Africa Group obligations and statutory functions
Gender	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 Emerging Africa Group obligations and statutory functions
Photo(s) and video(s)	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 Emerging Africa Group obligations and statutory functions
Bank account detail(s)	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 Emerging Africa Group obligations and statutory functions
Phone number(s)	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 Emerging Africa Group obligations and statutory functions
Email address	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 Emerging Africa Group obligations and statutory functions
National Health Insurance (NHIS) details	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 Emerging Africa Group obligations and statutory functions
Academic qualification(s) details	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 Emerging Africa Group obligations and statutory functions
Contractors and Service Providers details	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 Emerging Africa Group obligations and statutory functions

Bank verification number (BVN)	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 Emerging Africa Group obligations and statutory functions
Pension fund administrator details (PFA)	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 Emerging Africa Group obligations and statutory functions
Employment details	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 Emerging Africa Group obligations and statutory functions

5. DATA PROTECTION PRIVACY POLICIES

At Emerging Africa Group, we treat your privacy with the highest importance. Our Data Protection Privacy Policy details the measures we take to preserving and safely guarding your privacy when you visit our website or communicate with our personnel. This Policy has been approved and provided by our legal advisors.

These policies include:

a. Privacy Policies

- i. Data Collection
- ii. Your Personal Data and how it is Used
- iii. Change of Purpose
- iv. Your Personal Data Rights
- v. Persons who have access to your personal Data
- vi. Security and Confidentiality
- vii. Transfer of Personal Data outside Nigeria
- viii. Retention of Personal Data
- ix. Third Party Links

b. Cookies Policy

c. Subject Access Request Response Procedure

6. DEFINITIONS AND INTERPRETATION

- **Affiliated Third Parties** includes companies with which we have common ownership or management or other contractual strategic support or partnership relationships with, our advisers, consultants, bankers, vendors or sub-contractors.
- **Data** is information, which is stored electronically, on a computer, or in certain paper-based filing systems.

- **Data Controller** is a person responsible for determining the manner in which Personal Data would be processed.
- **Data Subject** is an identifiable natural person. An identifiable natural person is 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.
- **DPO** means Data Protection Officer;
- **DPIA** means Data Protection Impact Assessment;
- **NDPR** means the Nigerian Data Protection Regulations, 2019.
- **NITDA** means the National Information Technology Development Agency.
- **Personal Data** is the information relating to an identified or identifiable natural person. These include a name, gender, a photo, an email address, bank details, medical information, computer internet protocol address and any other information specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.
- **Processing** is any activity that involves use of Personal Data. It includes obtaining, recording or holding the data, or carrying out any operation or set of operations on the data including organising, amending, recording, retrieving, using, disclosing, erasing or destroying it. Processing also includes transferring personal data to third parties.
- **Sensitive Personal Data** includes information about a person's racial origin, political opinions, religious or similar beliefs, trade union membership, physical or mental health or condition or sexual life.

7. **PRIVACY POLICY**

7.1. **DATA COLLECTION**

The Emerging Africa Group may collect, use, store and transfer different kinds of Personal Data about you which is grouped together as follows:

- a. **Identity Data** includes first name, last name, username or similar identifier, title, date of birth and gender.
- b. **Contact Data** includes residential address, email address and telephone numbers.
- c. **Human Resource Data** includes information on your employment history, professional and educational information submitted upon applying for employment with us.

- d. **Technical Data** includes internet protocol (IP) address, domain name, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access this website.
- e. **Profile Data** includes your username and password, purchases or orders made by you, your interests, preferences, feedback and survey responses.
- f. **Usage Data** includes information about how you use our website and services.
- g. **Marketing and Communications Data** includes your preferences in receiving marketing communications from us and our Affiliated Third Parties and your communication preferences.

You provide this information through direct interaction when you visit the Emerging Africa Group website, sign up to its newsletters or publications, request marketing materials to be sent to you, respond to surveys, complete its feedback or comment form, provide your business card to any of its staff, sign its visitor management form, complete other forms, apply for employment through its careers page, or contact Emerging Africa Group to request for any information or other correspondence by post, email, its website or otherwise.

As you interact with the Emerging Africa Group website, the Emerging Africa Group will automatically collect technical data about your equipment, browsing actions and patterns. The Emerging Africa Group collects this data by using cookies, and other similar technologies. Please see the Emerging Africa Group Cookies Policy for further details.

The Emerging Africa Group do not intentionally or knowingly collect any Sensitive Personal Data. Please do not send to the Emerging Africa Group nor disclose such Sensitive Personal Data except where required for a specific purpose.

7.2. **YOUR PERSONAL DATA AND HOW IT IS USED**

Primarily, the Emerging Africa Group collects, processes and stores your Personal Data to help the Emerging Africa Group better connect with you. The following are the purposes for which the Emerging Africa Group collects your Personal Data:

- a. To monitor, review, evaluate and improve your experience when you visit the Emerging Africa Group website
- b. To analyse the traffic on the Emerging Africa Group website, including determining the number of visitors to the website and analyse how they navigate the website.
- c. To invite you to complete a survey or provide feedback to the Emerging Africa Group on specific matters.
- d. At any time, you request information from us via a form or other electronic transmission the Emerging Africa Group may use your Personal Data to fulfil

that request and keep a record of such request and how it was handled, for quality assurance and service improvement purposes.

- e. To keep you updated on the Emerging Africa Group activities, programmes and events where your explicit consent has been given.
- f. To notify you of changes to the Emerging Africa Group websites or relevant processes.
- g. The Emerging Africa Group may also use your information or allow Affiliated Third Parties such as its subsidiaries or partners use your Personal Data, to offer you information about unrelated products or services you may be interested in. The Emerging Africa Group or such Affiliated Third Parties can only communicate with you if you have expressly consented to such communication and data use.
- h. The Emerging Africa Group may share your personal data with Affiliated Third Parties such as service providers who we have engaged to assist with providing certain services on our behalf, for which they require your personal data.
- i. Where the Emerging Africa Group has any contracts with you which create a commitment, the Emerging Africa Group may require contact or use of your information to perform the contract.
- j. To process or manage your appointments with any of the Emerging Africa Group staff.
- k. To fulfil legal/ regulatory obligations or to report any criminal or unethical activity.
- l. To store either on our central computer system or a third-party Computer's central computer system for archiving and back up purposes.

Be aware that the Emerging Africa Group do not reveal identifiable information about you to its advertisers, though the Emerging Africa Group may at times share statistical visitor information with its advertisers.

8. CHANGE OF PURPOSE

The Emerging Africa Group will only use your Personal Data for the aforementioned purposes, unless the Emerging Africa Group reasonably consider that it needs to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact the Emerging Africa Group. If the Emerging Africa Group need to use your Personal Data for an unrelated purpose, the Emerging Africa Group will notify you and request for your express consent.

9. YOUR PERSONAL DATA RIGHTS

Data Protection Laws provides you with certain rights in relation to the information that the Emerging Africa Group collect about you.

- 9.1. The right to withdraw consent previously given to Emerging Africa Group or our Affiliated Third Parties. In order to make use of your personal data, Emerging Africa Group would have obtained your consent. For consent to be valid, it must be given voluntarily. In line with regulatory requirements, consent cannot be implied, and Emerging Africa Group ensure that you have the opportunity to read our data protection privacy policy before you provide your consent. Consent in respect of Sensitive Personal Data must be explicit and will be given by you in writing to the Emerging Africa Group. The consent of minors (under the age of 18) will always be protected and obtained from the minor's representatives in accordance with applicable regulatory requirements.

You can ask the Emerging Africa Group or Affiliated Third Parties to stop sending you marketing messages at any time by unsubscribing or unchecking relevant boxes to adjust your marketing preferences or by following the opt-out links on any marketing message sent to you.

- 9.2. The right to request that the Emerging Africa Group deletes your Personal Data that is in its possession, subject however to retention required for legal purposes and the time required technically to delete such information.
- 9.3. The right to request for access to your Personal Data or object to the Emerging Africa Group processing same. Where personal data is held electronically in a structured form, such that you have a right to receive that data in a common electronic format.
- 9.4. The right to update your Personal Data that is kept with the Emerging Africa Group. You may do this at anytime your personal data changes and you wish to update the Emerging Africa Group.
- 9.5. The right to receive your Personal Data and have it transferred to another Data Controller, as applicable.
- 9.6. The right to lodge a complaint.

You may exercise any of the above stated rights following our Data Subject Access Request Procedure.

10. **PERSONS WHO HAVE ACCESS TO YOUR PERSONAL DATA**

In addition to Emerging Africa Group staff who have a business need to know, the following trusted third parties have access to your information:

- 10.1. Emerging Africa Group uses a customer relationship management tool to help manage its contact database and send out email communications to you.
- 10.2. The Emerging Africa Group Affiliate Third Parties who require your information for the same purposes described in this Policy and who have adopted similar

privacy policy standards further to contractual obligations to the Emerging Africa Group under a third party data processing agreement the Emerging Africa Group has entered with them.

10.3. Professional service providers such as IT service providers and website hosts.

10.4. Regulatory authorities.

Emerging Africa Group will transfer your Personal Data to only those Affiliated Third Parties who the Emerging Africa Group are sure can offer the required level of protection to your privacy and information and who are also contractually obligated to us to do so. The Emerging Africa Group do not and will not at any point in time sell your Personal Data. The Emerging Africa Group require all Affiliated Third Parties to respect the security of your personal data and to treat it in accordance with the law. The Emerging Africa Group do not allow our professional service providers to use your Personal Data for their own purposes and only permit them to process your Personal Data for specified purposes and in accordance with its instructions.

11. SECURITY & CONFIDENTIALITY

Information submitted by you is stored on secure servers the Emerging Africa Group has which are encrypted and access is restricted to only authorised persons in charge of maintaining the servers. the Emerging Africa Group have put in place physical, electronic and procedural processes that safeguard and protect your information against unauthorised access, modification or erasure. However, the Emerging Africa Group cannot guarantee 100% security as no security programme is completely fool proof. In the unlikely event that the Emerging Africa Group experience any breach to your personal data, such breach shall be handled in accordance with the Emerging Africa Group Data Privacy Policy. All such breaches shall be notified to the NITDA within 72 hours of occurrence and were deemed necessary, based on the severity and potential risks, we shall notify you of such occurrence, steps taken and remedies employed to prevent a reoccurrence.

The Emerging Africa Group staff also have an obligation to maintain the confidentiality of any Personal Data held by us.

As you know, transmission of data on the internet is never guaranteed regarding safety. It is impossible to completely guarantee your safety with electronic data and transmission. You are therefore at your own risk if you elect to transmit any data electronically.

12. TRANSFER OF PERSONAL DATA OUTSIDE NIGERIA

The Personal Data the Emerging Africa Group collects may be transferred to and processed in another country other than your country of residence for the purposes stated above, with your consent. The data protection laws in those countries may be different from, and less stringent than the laws applicable in your country of residence.

By accepting this Policy or by providing your Personal Data to the Emerging Africa Group, you expressly consent to such transfer and Processing. The Emerging Africa Group will however take all reasonable steps to ensure that your data is treated securely and transfer of your Personal Data will only be done in accordance with the requirements of applicable laws and to parties who have put in place adequate controls to secure and protect your Personal Data.

13. RETENTION OF PERSONAL DATA

The Emerging Africa Group shall retain your Personal Data for no longer than reasonably necessary for the purposes set out in this Policy and in accordance with legal, regulatory, tax, accounting or reporting requirements.

The Emerging Africa Group may retain your Personal Data for a longer period in the event of a complaint or if the Emerging Africa Group reasonably believes there is a prospect of litigation in respect to the relationship with you.

To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the Personal Data, the potential risk of harm from unauthorised use or disclosure of your Personal Data, the purposes for which the Emerging Africa Group has processed your Personal Data and whether the Emerging Africa Group can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.

Where your Personal Data is contained within a document, the retention period applicable to such type of document in our document Retention Policy shall apply.

14. THIRD PARTY LINKS

The Emerging Africa Group website or its email communication may include links to third party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. The Emerging Africa Group do not control these third-party websites and are not responsible for their privacy statements. When you leave the Emerging Africa Group website, you are encouraged to read the privacy policy of every website you visit.

b. COOKIES POLICY

1. the Emerging Africa Group advertisers and organisation may have the occasion to collect information in regard to your computer for our services. The information is gained in a statistical manner for the Emerging Africa Group use or advertisers on our site.
2. Data gathered will not identify you personally. It is strictly aggregate statistical data about the Emerging Africa Group visitors and how they used the Emerging Africa Group resources on the site. No identifying Personal Data will be shared at any time via cookies.

3. Close to the above, data gathering can be about general online use through a cookie file. When used, cookies are automatically placed in your hard drive where information transferred to your computer can be found. These cookies are designed to help us correct and improve our site's services for you. You may elect to decline all cookies via your computer or set up alerts to prompt you when websites set or access cookies. Every computer has the ability to decline file downloads like cookies. Your browser has an option to enable the declining of cookies. If you do decline cookie downloads you may be limited to certain areas of Emerging Africa Group site, as there are parts of the Emerging Africa Group site that require cookies.
4. Any of our advertisers may also have a use for cookies. the Emerging Africa Group is not responsible, nor do the Emerging Africa Group have control of the cookies downloaded from advertisements. They are downloaded only if you click on the advertisement.

c. SUBJECT ACCESS REQUEST RESPONSE PROCEDURE

1. Where you wish to exercise any of your data privacy rights you shall make a formal request by completing the Subject Access Request Form (SAR Form) and sending the completed form via email to us at privacy@emergingafricagroup.com.
2. The Emerging Africa Group shall contact you within 5 working days of the receipt of the SAR Form to confirm receipt of the subject access request and may request additional information to verify and confirm the identity of the individual making the request.
3. On receiving any request from you, the Emerging Africa Group shall record the request and carry out verification of the identity of the individual making the request using the details provided in the SAR Form and a valid means of identification such as international passport, driver's license, national identification card or any other acceptable means of identification.
4. Where the request is from a third party (such as relative or your representative), the Emerging Africa Group will verify their authority to act for you and may contact you to confirm their identity and request your consent to disclose the information.
5. When your identity is verified, the Emerging Africa Group shall coordinate the gathering of all information collected with respect to you in a concise, transparent, intelligible and easily accessible form, using clear and plain

language with a view to responding to the specific request. The information may be provided in writing, or by other means, including, where appropriate, by electronic means or orally provided that your identity is proven by other means. the Emerging Africa Group may also contact you to ask you for further information in relation to your request to speed up its response.

6. Where the information requested relates directly or indirectly to another person, the Emerging Africa Group will seek the consent of that person before processing the request. However, where disclosure would adversely affect the rights and freedoms of others and the Emerging Africa Group is unable to disclose the information, the Emerging Africa Group will inform you promptly, with reasons for that decision.

7. **FEES AND TIMEFRAME**

- i. The Emerging Africa Group shall ensure that it provides the information required by you within a period of one month from the receipt of the request. Occasionally, it could take the Emerging Africa Group longer than a month if your request is particularly complex or you have made a number of requests. In this case, the Emerging Africa Group will notify you and keep you updated. However, where the Emerging Africa Group is unable to act on your request, the Emerging Africa Group shall inform you promptly at least within one month of receipt of the request of the reasons for not taking action and give you the option of lodging a complaint with the NITDA, in line with the NDPR 2019.
- ii. Where the request relates to any perceived violation of your rights, the Emerging Africa Group shall take appropriate steps to remedy such violations, once confirmed. Remedies shall include but not limited to the investigation and reporting to appropriate authorities, recovering the personal data, correcting it and/ or enhancing controls around it. You shall be appropriately informed of the remedies employed.
- iii. Any information provided to you by the Emerging Africa Group shall be provided free of charge. However, where requests are manifestly unfounded or excessive in particular because of their repetitive or cumbersome nature, the Emerging Africa Group may:
 - a. charge a reasonable fee taking into account the administrative costs of providing the information or communication, taking the action required or making a decision to refuse to act on the request; or

- b. write a letter to you stating refusal to act on the request and copying the NITDA.

8. **EXCEPTIONS TO DATA SUBJECTS ACCESS RIGHTS**

To the extent permitted by applicable laws, the Emerging Africa Group may refuse to act on your request, if at least one of the following applies:

- i. in compliance with a legal obligation to which the Emerging Africa Group are subject;
- ii. protecting your vital interests or of another natural person; and
- iii. for public interest or in exercise of official public mandate vested in the Emerging Africa Group.

CONTACT US

The Emerging Africa Group welcome any queries, requests you may have regarding our Data Protection Privacy Policies, or our privacy practices. Please feel free to contact us at privacy@emergingafricagroup.com or by completing the **Subject Access Request Form (SAR Form)**

PRIVACY POLICY

Document Approval and Review

Policy Owner	Data Protection Officer

Approval

DATE APPROVED	APPROVED BY	SIGNATURE
February 23, 2021	The Board Risk Management and Compliance Committee	

Revision History

Date	Version	Changes Made