## **Privacy Policy**

It is important to Renaissance Capital Africa or any subsidiary and/or affiliate thereof (or "Firm") that we keep your personal information secure and ensure that you understand how we use that information. The goal of our Privacy Policy is to help you understand how the personal information you choose to share with us through this site is used and maintained.

We have provided this site in order that you may read about our Firm, its products and services as well as receive the latest market news from countries such as Nigeria as well as any other relevant markets all without giving us any personal information about yourself.

However, some of the special features on our website require registration before you can use them. If you register or are registered to receive our research and/or as a client of the Firm, you choose to provide us with certain personal information such as your name, address, e-mail, identity information (such as a passport number), company affiliation and telephone number. Upon registration, you can choose to create and save, change or delete personalized data that you enter. You may also change your password at any time.

Please note that the personal information you provide and the personalized data you create and save on this site are used to provide a superior service to you and to inform you of our products, services, or other opportunities that may be available through our Firm or our affiliates. Such information and data will also be used to administer our business, this site, and our services in a manner consistent with the terms and conditions that govern your use of this site as well as all applicable laws, rules, regulations, or other legal obligations.

We do not sell or market your personal information or personalized data to unaffiliated organizations. If you provide us with your e-mail address, or have done so in the past, we may upon occasion send you e-mails. E-mails sent to us through this site will be maintained in a manner consistent with our legal and regulatory requirements regarding client and public communications.

We maintain your personal information and data according to strict standards of security and confidentiality. Please note that as a client of the Firm online access to your account portfolio is only possible through a secure (SSL capable) web browser. SSL capable web browsers support encryption technology, which helps prevent unauthorized users from viewing your account information as it travels over the Internet.

This privacy statement does not supersede the terms and conditions that govern your use of this site. Any conflict between the two shall be determined in favor of such terms and conditions. The Firm may change this statement at any time. Any changes or updates will be effective immediately upon posting to this site.

**DATA PROTECTION AND PERMITTED DISCLOSURES** — We may obtain information, including personal data and sensitive personal data, each as defined in the Data Protection Laws about your directors, employees, officers, agents or clients. We will treat as confidential (both during and after the termination of any relationship between us) any personal information as well as

other information learned about each other, your investment strategy, holdings, products or services in the course of the relationship and except as otherwise agreed, shall not disclose the same to any third party without the other party's consent. For the purposes of the Data Protection Laws, we will be the data controller in respect of any personal data that you provide to us. We may process any such information (whether provided electronically or otherwise) to the extent necessary in order to administer and operate certain services. These activities includes:

- To pursue legitimate interests in the course of the operational support and development of business, including to evaluate customer service, efficiency, and for risk management purposes;
- To carry out credit, money laundering or conflict checks, and for fraud and financial crime prevention purposes;
- To exercise and defend our legal rights or that of any Affiliate in order to comply with legal and regulatory obligations applicable to us or to comply with legal and regulatory requests made to any affiliate;
- For reporting (including, without limitation, transaction reporting and position reporting) and audits by national and international regulatory, enforcement or exchange bodies;
- For complying with court orders associated with us or any Affiliate or for recording of communications that may disclose certain information for general regulatory purposes, i.e.; to meet the requirements or enquiries of the our regulators or any other competent regulatory authority;
- For complying with information requests from an exchange, clearing house or a selfregulated organisation (whether of a governmental nature or otherwise) in any jurisdiction;
- Providing our Affiliates, service providers, brokers, dealers, custodians, agents, bankers, auditors and professional advisers anyone to whom we transfer or propose to transfer certain information;
- For conducting credit reference checks that help us and others make credit decisions and reduce the incidence of fraud or in the course of carrying out identity, or fraud prevention.

We may also transfer or disclose such information to our Affiliates or to third parties processing such information on our own or our Affiliates' behalf or to third parties such as settlement agents, overseas banks, exchanges or clearing houses to whom we disclose information while providing certain services. Where such information is transferred to countries or territories outside Nigeria or countries not offering an adequate level of data protection, we will put in place appropriate data transfer mechanisms, either by having in a Nigerian approved standard contractual clause to govern the transfer or using another basis to ensure the transfer complies with the applicable Data Protection Laws, as applicable. We will retain the information received from you in an identifiable form for as long as necessary to meet legal, regulatory, and business requirements. Retention periods may be extended if we and/or our Affiliates are required to preserve such information in connection with litigation, investigations, or other proceedings.

## **Contact Details**:

Renaissance Securities (Nigeria) Limited, 17A Ozumba Mbadiwe Avenue, Victoria Island, Lagos

E-mail: DataProtection@rencapafrica.com