

OUR PRIVACY POLICY

Our Privacy Policy describes how we use your personal information we collect from you. It explains the following topics:

- What data we collect
- Why we collect the data
- When we collect the data
- Grounds for processing your data
- What we use your data for
- Who we share your data with
- Your rights as data subject
- Remedies for data breach
- What are Cookies
- Why we use cookies
- What types of Cookies do we use
- How to manage cookies
- Privacy Policies of other websites
- Changes to our privacy policy
- How to contact us
- How to contact the appropriate authority

What data we collect

We collect your personal information necessary to access our products, which are majorly online. This include name, phone number, date of birth address, references, Bank Verification Number (BVN), NIN, photographs, means of identification, geo-location, mobile device data, tracking and cookies data etc. All these pieces of information are necessary to access our products online. You may be required to take a photograph of yourself and upload on our site for security and quality control and online verification process. For the purpose of our e-KYC verification required to gain access to our product, we may collect your location

and some other personal information with your permission to enable us verify your provided address.

WHY WE COLLECT THE DATA

We collect your information to meet our compliance obligations, to comply with laws and regulations and to share it with regulators when absolutely necessary. This includes location data collected from your mobile device, utilized to perform electronic address verification KYC requirement. This information will be stored securely and shared only with regulators when required

WHEN WE COLLECT THE DATA

- When you perform transactions such as make deposits, withdrawals from your account, make payments, trading of cards require us collecting your data
- When you provide information concerning your identity e.g. photo I.D, passport information, National ID card and nationality.
- When you seek information or assistance or help from our customer service provider for the purpose of resolving complaints or disputes.
- When you complete bank verification number procedure e.g. fingerprints, facial authentication, other personal information as mandated by law.
- When you use your log in credentials for online transactions on our apps.
- You use or view our website via your browser cookies
- When you use or view our websites via your browser's cookies
- We conduct necessary investigations i.e. due diligence checks and AML/CFT checks and obtain information that we need to support our regulatory obligations, e.g. information about transaction details, detection of any suspicious and unusual activities.

GROUNDNS FOR PROCESSING YOUR DATA

- For the performance of a contract to which the data subject is a party
- For compliance with a legal obligation to which the data controller or data processor is subject
- For the performance of a task carried out in the public interest or in the exercise of official authority vested in the data controller or data processor
- To protect the vital interest of the data subject or another person.
- For the purpose of the legitimate interests pursued by the data controller or data processor or by a third party to whom the data is disclosed.

WHAT WE USE YOUR DATA FOR

- Supricon Ltd. will only use your information when you have provided your consent or when Supricon Ltd. is required by law to do so or when our services require same.
- We make appropriate use of your data to manage transactions, respond to your requests and to provide you with more relevant services.
- We use your information to deliver our products and services, carry out your instructions and to serve you with all our online products.
- We use your information to meet our compliance obligations, to comply with laws and regulations and to share it with regulators when necessary.
- We may use your email to send announcement to you or important news about your account.
- We may be required to conduct a facial recognition process which will be compared against the required identity data.

WHO WE SHARE YOUR DATA WITH

To enjoy a seamless service delivery, we may share your data with our technical support and other service providers, partners and associates. Where applicable, we execute compliant data-sharing agreements to provide protection for personal information shared in the process.

Your rights as Data Subject

- Right to confirm the purpose of processing of individual data
- Right to make enquiry on whom the personal data have been or will be disclosed.
- Right to confirm the period for which the personal data would be retained or stored and the criteria used to determine the period.
- Right to request from the data controller rectification or erasure of personal data.
- Right to request for restriction of processing of personal data or to object to such processing.
- Right to withdraw consent to the processing of personal information.

Remedies for data breach

In the event of an infringement of data protection rights, we will ensure any damage is remedied within the shortest possible time. However you are at liberty to report to the Nigeria Data Protection Commission (NDPC) or seek other legal remedies.

What are Cookies?

Cookies are text files placed on your computer to collect standard internet log information and visitor behavior information. When you visit our websites, we may collect information from you automatically through cookies or similar technology.

Why we use Cookies

Our Company uses cookies for the following reasons:

- To keep track of your activity during a visit to our website, to keep you logged in without having to re-enter information.
- We use cookies on our website to monitor user behavior, such as pages visited, time spent on the site and helps us understand user engagement and improve content and services.

What type of cookies do we use?

Our company uses the following cookies on our website:

- **Functionality** -These cookies enable us to recognize you on our website and remember your previously selected preferences.
- **Advertising**-These cookies used by our Company enable us to collect information about your visit to our website, the content you viewed, the links you followed and information about your browser, device and IP address. Our company sometimes shares some limited aspects of this data with third parties for advertising purposes. We may also share online data collected through cookies with our advertising partners.
- **Analytics** – Our company uses cookies for analytical purposes to understand how you interact with a particular service. These cookies help collect data that allows us to measure audience engagement, site statistics , help understand how services are used and to enhance their content quality and features.

How to manage cookies

You can set your browser not to accept cookies and to clear cookies and browsing data. This is done by accessing your browser's settings or preferences, then navigate to the Privacy and Security session. From there, you can adjust settings to allow or block all cookies to balance privacy and site functionality.

Privacy policies of other websites

Our company website contains 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.

Changes to our privacy policy

Our privacy policy is subject to review from time to time. Update on our privacy policy shall be placed on our web page.

How to contact us

For further enquiry or further information on anything included in this Privacy Policy or you have any data protection queries or concerns, you can contact the Data Protection Officer at dataprotectionandprivacy@supricon.com or contact us at A306 Alhaja Mogaji Mall, Ogba, Lagos Nigeria

How to contact the appropriate authority

Should you wish to report a complaint or if you feel like our company has not addressed your concern in a satisfactory manner, you may contact the information commissioner's email: info@ndpc.gov.ng.

