



SOLOMONHILLS

Privacy policy

Last updated: June 1, 2022.

This Privacy Policy explains how SolomonHills Investment Limited (“we”, “us”, “our”) collects, uses, discloses, and protects personal information (Personal Data) when you use our website or interact with us, regardless of means of access. Kindly review the Privacy Policy to stay informed about our practices whenever you interact with us.

Introduction

SolomonHills is an investment platform that simplifies investing and makes it easy and affordable for Nigerians to access investments and achieve their financial goals. SolomonHills respects your privacy and is committed to protecting your Personal Data. Our goal with this Privacy Policy is to provide a clear and concise explanation of the Personal Data we collect as you access our Services, and how we use and share it.

By accessing and using SolomonHills services, you agree to the practices described in this Privacy Policy. You may access or use our Services through a laptop, desktop, mobile phone, tablet, or another electronic device (collectively, a “Device”).

This Privacy policy applies to the use of our websites and other online services and/or any related services, sales, marketing, events, and social media activities (collectively, our “Services”) by our consumer users (“User”). This Privacy Policy also applies to offline interactions with SolomonHills.

Information we collect

We collect the Personal Data you share with us when you create an account with SolomonHills or communicate with us about your SolomonHills account. The Personal Data we collect may include your name, address, mobile phone number, email address, date of birth, banking details, next of kin details, image, and other information that identifies you.

As a User, we'd also ask you to create login information for your SolomonHills accounts such as username and password. In general, we collect the Personal Data you share with us by filling in forms or interacting with us via our website, phone call, email, social media posts, or otherwise.

1. Information about your transactions with us

We collect Personal Data as you use your SolomonHills account to perform financial transactions. The Personal Data we collect during financial transactions include the Naira amount, transaction time, and transaction details.

2. Personal Data from Third Party Sources

When you create an account on SolomonHills, we may collect additional information about you from non-affiliated third-party sources to further verify you and prevent fraud. We may also collect your Personal Data from a User where your details are filled in a Next-of-Kin form.

3. Information we collect automatically from our services

When you access or use our services, we automatically collect Personal Data and other information such as your statistical information ("Analytics") that are correlated with your Personal Data. Analytics that are directly or indirectly correlated with Personal Data will be considered as Personal Data for the purpose of this Privacy Policy.

The Personal Data we collect automatically as you access or use our services include:

- a. Device Information: We may collect information about the Device you use to access our services, such as hardware model, operating system version, unique device identifiers, and mobile network information. These pieces of information may be associated with your SolomonHills account.

- b. Log Information: We may record or log information from your devices about your use of our Services including your Device's Internet Protocol (IP) address, the type of browser you use, access times, pages viewed, date and time stamps of transactions, and other interactions with our Services such as the page you visited before navigating to our Services.
- c. Location Information: We may collect your location information from your Device as you access our Services.
- d. Information Collected through Cookies and Other Technologies: We use various technologies to personalize our Services for you, and this may include sending cookies to your Device. Additional information about cookies and how they work is available [here](#). You can find more information about how we use cookies and your related choices in our Cookies policy. We may also collect information using tracking pixels to understand usage, campaign effectiveness, and the open rate of the emails we send.

Do-Not-Track Signals

We (indicate whether “allow” or “do not use technologies that recognize”) Do-Not-Track browser configurations which may alter the tracking technologies we use.

How we use personal data

SolomonHills is based in Nigeria and so, we consider the lawful basis for using your Personal Data as set out in the Nigeria Data Protection Regulation (NDPR) and will only use your data if we have a proper reason for doing so. According to this, we may use your Personal Data as follows:

- To verify your identity and prevent fraud.
- For our general commercial purposes, including offering products and services that we think might interest you.
- To improve our Services and give you a better experience.
- Monitor and analyze activities in connection with our Services.

We may also use your email address to respond to your inquiries and provide information about our Services. You may choose to opt out from receiving our offers and promotional emails by contacting us or by following the “unsubscribe” instructions from any communication you receive from us. As a User, if you unsubscribe from receiving

promotional emails from us, we may still send you non-promotional emails such as emails about your SolomonHills account and our ongoing business relations.

How long we store personal data

All Personal Data shared with us is stored on our secure cloud storage solution and the storage of Personal Data is dependent on the purpose of processing:

- For requests, questions and consultations, we will store your Personal Data for as long as it takes us to answer your request, question, and/or consultation.
- For sign-ups and use of our Services, we will store your Personal Data for the purpose for which it was collected.
- For commercial or promotional communications, we will store your Personal Data until your objection.

How we share personal data

Privacy is our priority. Our main focus is to help you achieve financial security and freedom, not to sell your data. We do not sell or rent Personal Data to marketers. We may, however, share your Personal Data with affiliated and non-affiliated third parties as follows:

1. With another user, when you sign up on SolomonHills using a voucher, the user that sent you the voucher may receive information indicating that you have used the voucher received.
2. With non-financial companies, such as email service providers through which we perform marketing services.
3. **With another user, when you sign up on SolomonHills using a referral link. The user that referred you may receive information indicating that you have signed up for our Services.**
4. With a non-affiliated third-party financial service provider to access and transmit your personal and financial information from a relevant financial institution.

With non-affiliated companies for our everyday business purposes, we may share your Personal Data:

1. To process transactions and maintain accounts.
2. In response to court orders and legal investigations.
3. In response to a request for Personal Data, if we are required by any applicable law or regulation.
4. With relevant law enforcement officials or other third parties, such as investigators or auditors, if we believe it is appropriate to investigate fraud.

5. With your consent or at your direction, including if we notify you that the Personal Data you provide will be shared in a particular manner and you provide such Personal Data.

We will not share your Personal Data with other third parties without your consent.

Your Rights

1. Account information

We recommend that you provide accurate information about your Personal Data and as such, you have the right to edit it by logging into your account via our Services. Any changes will affect only future uses of your Personal Data and we may need to verify the accuracy of the new data you provide to us. If you wish to delete or deactivate your SolomonHills account, please contact us. We may, however, retain certain Personal Data as required by law or for legitimate purposes.

2. Promotional Communications

You may opt-out of receiving our offers and promotional emails by following the “unsubscribe” instruction in any communication you receive from us. Please note that as a User, if you unsubscribe from receiving promotional emails from us, we may still send you non-promotional emails such as emails about your SolomonHills account and our ongoing business relations.

3. Cookies

Most web browsers are set to accept cookies by default. You have the right to set your browser to reject browser cookies. Please note that rejecting cookies may affect the functionality of our Services.

4. Social sharing features

Our Services include social sharing features for common social networks to enable users to share content with friends or the public. These features are served by third-party services that may serve their cookies and we have no control over these. For more information about the purpose and scope of data collection and processing in connection with social sharing features, please visit the privacy policies of the entities that provide these features.

5. Other rights

According to the Nigeria Data Protection Regulation (NDPR), you have a right to consent to this Privacy Policy and to withdraw your consent at any time. You also have a right to freely transfer your data received from us to any other person. For more information about your rights over your Personal Data, you may visit your [NITDA's website](#). If you wish to exercise your rights, please write to us at hello@solomonhills.com

Links to Third-Party Websites

We may allow third-party websites to link to our Services. We are not responsible for the privacy policy of any third parties or content of linked websites, but we do encourage you to read the applicable privacy policies and terms of use of such parties and websites. This Privacy Policy only applies to our Services.

Changes to our Privacy Policy

Subject to applicable law, we may revise this Privacy Policy at any time and at our sole discretion. When we revise this Privacy Policy, we will update the date at the top of this Privacy Policy. The revised Privacy Policy will be effective upon posting via our Services unless otherwise required by applicable law. You are free to decide whether or not to accept a revised version of this Privacy Policy, but accepting it is required for you to continue accessing or using our Services.

Cookies

Last updated: June 1, 2022.

How we use cookies

We use various technologies to personalize our Services for you, and this may include sending cookies to your Device. We use cookies for record-keeping purposes to improve your experience with our Services. For example, when you log in to your SolomonHills account, cookies will help to recognize and keep you logged in as you

browse the website. These are technical cookies that are strictly necessary for the smooth running of our Services.

We also use the following types of cookies:

1. Analytical and performance cookies

These cookies are small data files stored on your Device memory to allow us to see how you use our Services and the popular features of our Services you visit the most. It allows us to recognize and count your visits to our website and see how you browse around our website. This is required to help us improve our Services to suit your needs.

2. Targeting cookies

These cookies allow us to see the pages and links you visited before accessing our Services. This helps us understand where the bulk of our traffic comes from and enables us to provide more relevant ads.

3. Google Analytics cookies

These cookies identify and analyze website trends but do not identify you individually. They are simply “session cookies” and end as soon as you close your website browser.

How to change your preferences

Except for technical cookies which are strictly necessary for the smooth running of our Services, you may choose to accept or reject cookies.

You can set your browser to reject browser cookies. However, if you reject all our cookies (including the technical cookies), you may not be able to access all of our Services. You can learn more on how to opt out of Google Analytics site activity tracking by clicking [here](#).

Security

SolomonHills takes adequate measures to protect your Personal Data from loss, theft, misuse, and unauthorized access. Additionally, SolomonHills implements policies that protect the confidentiality and security of your nonpublic Personal Data, including this Privacy Policy. Access to your Personal Data is limited only to employees with a business reason to know, and security procedures are set in place to protect the confidentiality and security of such Personal Data and prohibit unlawful disclosure.

We have taken measures to provide security facilities for the protection of your Personal Data through the setup of firewalls, limited access to specified authorized individuals, and encryption. **We have also enabled a default two-factor authentication (2FA) on all SolomonHills accounts to protect you from unauthorized access.**

When your bank account information is transmitted via our Services, it will be protected by encryption technology, such as Secure Sockets Layer (SSL) and all sensitive Personal Data is encrypted with Advanced Encryption Standard (AES) 256 bit encryption. We, therefore, have digital and physical security measures to eliminate the possibility of data privacy breach incidents. We have put in place procedures to deal with any suspected Personal Data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

For passwords chosen to access certain parts of our Services, you are responsible for keeping this password confidential. Please safeguard your username and password for your SolomonHills account login information. You agree to notify us immediately of any unauthorized use of your SolomonHills account or any other breach of security.

If you have any questions, concerns, or comments, you can contact us via mail at hello@solomonhills.com or call us on +234 (0) 702 674 7792.

[SolomonHills. 5, Odebiyi Street, Ogba, Lagos](#)