

VANIR CAPITAL PRIVACY POLICY

This Privacy Policy is designed to help you understand what information we gather about you, what we use that information for, and with whom we share that information. It also sets out your rights in relation to your information and who you may contact for more information or queries. Please read the following carefully to understand our processes and practices regarding your personal data and how we will treat it.

By visiting www.vanircapital.org (“our site”) you are accepting and consenting to the practices described in this policy. Please note that by clicking the “Connect with Facebook” button you are agreeing that Facebook may share personal data held by them with us. The collection and processing of your personal data is in accordance with the National Information Technology Development Agency Act 2007 (the “Act”), Nigeria Data Protection Regulation 2019 (the “Regulations”) and the provisions and prescriptions of Section 5; Part 1 and Part 2 of National Information Systems and Network Security Standards and Guidelines

Information we may collect from you

We may collect and process the following data about you:

1. Information you give us:

You may give us information about you by filling in forms on our site www.vanircapital.org and by allowing us to access your information on social media sites (including but not limited to Facebook, Twitter and LinkedIn) or by corresponding with us by phone, e-mail or otherwise. This includes information you provide when you register to use our site, apply for a loan, search for a feature (for example but not limited to, loan amounts, currency, loan duration), your activity levels on boards or other social media functions on the applicable social media sites, the applications you use on social media sites, and when you report a problem with our site. The information you give us may include your name, address, e-mail address and phone number, login information for social networking sites, financial and credit card information, personal description, current and former places of employment, education, names of colleagues, contacts and friends, photographs, and lists of family members.

2. Information we collect about you:

With regard to each of your visits to our site we may automatically collect the following information:

- Technical information, including the Internet protocol (IP) address used to connect your computer to the Internet, your login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform;
- Information about your visit, including the full Uniform Resource Locators (URL) clickstream to, through and from our site (including date and time); products you viewed or searched for; page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), and methods used to browse away from the page and any phone number used to call our customer service number.;
- Anonymized repayment data.

2. Information we receive from others:

We may receive information about you if you use any of the other websites we operate, the other services we provide and/or the social media sites which you login to via our site. We are also working closely with third parties (including, for example, business partners, sub-contractors in technical, payment and delivery services, social media sites, advertising networks, analytics providers, search information providers, credit bureaus, and financial services and credit providers) and may receive information about you from them.

Disclosure of your Information

We may share your personal information with any member of our group, which means our subsidiaries, our ultimate holding company and its subsidiaries. We may share your information with selected third parties including:

- Business partners, suppliers and sub-contractors for the performance of any contract we enter into with them or you.
- Advertisers and advertising networks that require the data to select and serve relevant adverts to you and others. We do not disclose information about identifiable individuals to our advertisers, but we may provide them with aggregate information about our users (for example, we may inform them that 500 men aged under 30 have clicked on their advertisement on any given day). We may also use such aggregate information to help advertisers reach the kind of audience they want to target (for example, women in Lagos State).
- Analytics and search engine providers that assist us in the improvement and optimization of our site. We may disclose your personal information to third parties:
 - a) In the event that we sell or buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets.
 - b) If all of its assets are acquired by a third party, in which case personal data held by it about its customers will be one of the transferred assets.
- if we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our terms of use and other agreements or to protect the rights, property, or safe, our customers, or others. This includes exchanging information with other companies and organizations for the purposes of fraud protection and credit risk reduction.

Customer Consent

By ticking the **“I agree to the Terms and Conditions”**, which you hereby adopt as your electronic signature, you consent and agree that:

1. We can provide materials and other information about your legal rights and duties to you electronically.
2. We are authorised to share, receive and use data/information collected from your transaction with other affiliated third parties including but not limited to switching companies, mobile network operators, electricity companies, aggregators, credit bureaus, other financial institutions, e-commerce platforms etc.

Where we store your personal data

The data that we collect from you is stored on our secure servers where we have given you (or where you have chosen) a password which enables you to access certain parts of our site, you are responsible for keeping this password confidential. We ask you not to share a password with anyone. Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our site; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorized access.

Data Retention

Unless a longer retention period is required or permitted by law, we will only hold your data on our systems for the period necessary to fulfil the purposes outlined in this privacy policy.

Even if we delete your data, it may persist on backup or archival media for legal, tax or regulatory purposes.

Your Rights

You have the right to ask us not to process your personal data for marketing purposes and to withdraw your consent at any time. Please note that the withdrawal of your consent will not affect the lawful processing of data which we have obtained based on your previous consent. We will usually inform you (before collecting your data) if we intend to use your data for the aforementioned purposes or if we intend to disclose your information to any third party for such purposes. You can exercise your right to prevent such processing by checking certain boxes on the forms we use to collect your data. You can also exercise the right at any time by contacting us via email at support@vanircapital.org Our site may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

Remedies

Each of the parties will be entitled to enforce its rights in the event of a breach of the terms of this privacy policy, to recover damages caused by any breach of the provisions herein and to exercise all other rights existing under law. Any claim or dispute arising in relation to this privacy policy shall be subject to the jurisdiction of the courts of the Federal Republic of Nigeria. We shall not be liable for any breach where a claim in respect of such breach is not brought within one month of the date that such breach arose.

Limitation of liability

Notwithstanding any other provision in this privacy policy, its affiliates, officers, directors, employees, attorneys or agents shall have any liability with respect to, and you hereby waive, release and agree not to sue any of them upon, any claim for any special, indirect, incidental, consequential damages suffered or incurred by you in connection with, arising out of, or in any way related to, a breach of this privacy policy.

Access to information

The Act gives you the right to access information held about you. Your right of access can be exercised in accordance with the Act. Any access request may be subject to a fee in providing you with details of the information we hold about you.

We may update this policy from time to time by publishing a new version on our website. You should check this page occasionally to ensure you understand any changes to this policy.

Contact

Questions, comments and requests regarding this privacy policy are welcomed and should be addressed via email at support@vanircapital.org