



## **PRIVACY POLICY**

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Reviewed and Adopted By The Board Of Directors of NASD Plc On 30th day of April 2024

NASD Plc. (NASD) is dedicated to protecting the confidentiality and privacy of information entrusted to it. As part of this fundamental obligation, NASD Plc is committed to the appropriate protection and use of personal information (sometimes referred to as “personal data”, “personally identifiable information” or “PII”) that has been collected through our website, or any of our associated platforms and subsidiaries- (Platforms App, VentureRamp, NASD Trading Platform, NASD Private Market, NASD Cooperative Exchange, NASD Services Limited and NASD Technologies). NASD is an Over-the-Counter Securities Exchange licensed by the Securities and Exchange Commission and is a central infrastructure provider of liquidity and transparency in the capital market.

Throughout this document, “we”, “us”, “our” and “ours” refer to NASD and its associated platforms and subsidiaries. “NASD” also has the same meaning described above. Site refers to the website or associated platforms of NASD PLC.

## **YOUR PRIVACY IS OUR PRIORITY**

NASD is committed to protecting the security of your personal information and your right to privacy. This Privacy Policy governs how NASD collects, uses, maintains, and discloses information collected about individuals, such as you. This Privacy Policy applies to the Site and all products and services offered by NASD PLC.

This Policy (together with our Terms and Conditions) sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. If you have any questions or concerns about our policy, or our practices with regard to your personal information, please contact us at [info@nasdng.com](mailto:info@nasdng.com).

Some of the links on this website may lead to NASD or non-NASD websites with their own privacy notices which may be different from that contained in this Policy, and you should read those notices carefully.

## **1. TYPES OF INFORMATION WE COLLECT**

The Personal Information we may collect from you via a variety of ways, including, but not limited to, when you visit our site, register on the site, submit membership or issuer registration documents, subscribe to our newsletter, and in connection with other activities, services, features or resources we make available on our Site. This Personal information broadly falls into the following categories:

### **1.1. Personal Identifiable Information**

- a. **Identity and contact information**: includes but is not limited to information such as; Name, address, office address, signatures, biometric data, date of birth, nationality, citizenship, country of birth, copies of identity cards (“ID”), contact details, email ID, professional association details such as of the Chartered Institute of Stockbrokers, etc.
- b. **Financial details/circumstances** includes but is not limited to; Trading account details, Trading account number, Clearing House Number, bank account

details, credit/debit card details (including card brand and expiration date), Bank Verification Number (BVN), employment/occupational information, risk profile, financial objectives, financial knowledge and experience, preferences and any other information to assess the suitability of our products to you. We shall verify your BVN data and by your use of the relevant Services, you consent to the validation of your BVN data.

We store only very limited, if any, financial information that we collect. Otherwise, all financial information is stored by our payment processors with whom we have entered separate agreements.

**c. Other Personal Information**

- We may also ask you for information that could identify you when you report a problem with any of our platforms or services, personal information contained in your correspondence with us (such as e-mail, log files, and screenshots).
- Responses to surveys that we might ask you to complete for research and/or improvement purposes.
- Information relating to transactions or trades you carry out through any of our platforms.

The information above may be provided directly by you or by somebody designated by you to set up and administer your account with NASD.

If you are unable to or choose not to provide us with the personal information required for the performance of a service to you, we may be unable to provide you with a particular service.

**1.2. Information We Collect Automatically**

As you navigate through and interact with the Site and/or other platforms, we may use automatic data collection technologies to collect certain information about your equipment, browsing actions, and patterns. We use this information for our internal analytics purposes and to improve the quality and relevance of the Site and/or platform to our users.

Examples of this information include:

- a. Details of your use, including related traffic data, location data, logs, age, gender, market segment, interests (e.g., what securities and products you trade), and other communication data and the resources that you access and use on any of our Platforms.
- b. Data related to trading activities such as billing information, trader IDs, and statistical and other aggregated data derived from your use of any of our Platforms.
- c. Information about your device, computer, and network connection, including your IP address, operating system, hardware version, device settings, battery and signal strength, and browser type.

- d. Device locations, including specific geographic locations, such as through GPS, Bluetooth, or WIFI signals.
- e. Connection information such as the name of your mobile operator or ISP, language and time zone, and mobile phone number.

### 1.3. **Information We Obtain from Third Parties**

From time to time, we may receive personal information about you from third-party sources, subject to a written contract between NASD and the third party. The types of information we may collect from third parties include your name, contact details, and trading identification and we use the information we receive from these third parties to allow you to use our services and maintain and improve the accuracy of the records we hold about you.

## **2. THE LEGAL GROUNDS WE HAVE TO USE YOUR PERSONAL INFORMATION.**

NASD generally collects only the personal information necessary to fulfill your request. Where additional, optional information is sought, you will be notified of this at the point of collection.

The Data Protection Laws in Nigeria allow us to process personal information, so long as we have a ground under the law to do so. It also requires us to inform you what those grounds are. As a result, when we process your personal information, we will rely on one of the following processing conditions:

- 2.1. Performance of a contract: this is when the processing of your personal information is necessary to perform our obligations under a contract;
- 2.2. Legal obligation: this is when we are required to process your personal information to comply with a legal obligation, such as keeping records for tax purposes or providing information to a public body or law enforcement agency;
- 2.3. Legitimate interests: we may process information about you where it is in our legitimate interest to run a lawful business to do so in order to further that business, so long as it doesn't outweigh your interests. These may include:
  - a. To offer information and/or services to individuals who visit our Site or carry out a specific task.
  - b. To prevent fraud or criminal activity and to safeguard our IT systems.
  - c. To customize individuals' online experience and improve the performance usability and effectiveness of NASD's online presence.
  - d. To conduct, and analyze, our marketing activities.
  - e. To meet our corporate and social responsibility obligations.
- 2.4. Vital interests: The law permits us to process your personal data where the processing is necessary to protect your vital interest or the vital interests of another person.

### **3. WHO IS RESPONSIBLE FOR YOUR PERSONAL INFORMATION?**

NASD is your data controller and is responsible for processing your personal information described in this Privacy Policy.

### **4. HOW DO WE USE PERSONAL INFORMATION COLLECTED**

NASD may use your Personal Information to provide services to you and for our core business purposes including but not limited to:

- 4.1. To personalize your experience: We may use information in the aggregate to understand how you use the services and resources provided on our Site.
- 4.2. Respond to your queries and feedback (for example, if you've asked a question or submitted feedback via the site).
- 4.3. To improve our Site: We may use the feedback you provide to improve our products and services.
- 4.4. Developing and providing trading facilities, products, or services (whether made available by us or through us), this includes but is not limited to:
  - a. executing brokerage, trading, clearing, or other transactions and reporting on these transactions;
  - b. carrying out research, planning, and statistical analysis to develop or improve our products, services, security, service quality, and advertising strategies;
- 4.5. Assessing and processing applications, instructions, or requests from you;
- 4.6. Communicating with you, including providing you with updates on changes to products and services (whether made available by us or through us) including any additions, expansions, suspensions, and replacements of or to such products, services, and facilities and their terms and conditions, in line with your communications preferences;
- 4.7. Protect our business, reputation, resources, and equipment, manage network and information security, and prevent and detect fraud, dishonesty, and other crimes (for example, to prevent someone from trying to steal your identity);
- 4.8. Providing access to restricted pages or contents of our Site or Platforms;
- 4.9. Managing our infrastructure and business operations and complying with internal policies and procedures;
- 4.10. Responding to queries or feedback; and addressing or investigating any complaints, claims, or disputes;
- 4.11. Verifying your identity for the purposes of providing products or services;
- 4.12. Conducting credit checks, screenings, or due diligence checks as may be required under applicable law, regulation, or directive;
- 4.13. Enforcing obligations owed to us;
- 4.14. Monitoring products and services provided by or made available through us;
- 4.15. Complying with obligations and requirements imposed by us from time to time by any credit bureau or credit information sharing services of which we are a member or subscriber, and creating and maintaining credit and risk-related models;
- 4.16. Financial reporting, regulatory reporting, management reporting, risk management (including monitoring credit exposures), audit and record-keeping purposes;
- 4.17. Enabling any actual or proposed assignee or transferee, participant, or sub-participant of NASD's rights or obligations to evaluate any proposed transaction; or in the event of a merger, sale of NASD's assets, financing, or acquisition of all or a portion of our business

to another company, subject to execution of a confidentiality agreement with such third party; and/or

#### 4.18. Seeking professional advice, including legal advice.

We also use information to meet our compliance obligations, to comply with other laws and regulations, and to share with regulators and other authorities that NASD is subject to. This may include using it to help detect or prevent crime (including terrorism financing, money laundering, and other financial crimes). We'll only do this on the basis that it's needed to comply with a legal obligation, it's in our legitimate interests and that of others, or to prevent or detect unlawful acts.

We are committed to ensuring that the information we collect, and use is appropriate for these purposes, and does not constitute an invasion of your privacy. Your personal information is not used for any other purposes unless we obtain your permission, or unless otherwise required, or permitted by law, or professional standards.

## **5. DATA SECURITY**

The security and confidentiality of your personal information matters to us. We adopt appropriate data collection, storage, and processing practices, and security measures to protect against unauthorized access, alteration, disclosure, or destruction of your personal information.

We have implemented appropriate technical and organizational measures to secure such information from loss or unauthorized access, use, alteration, and disclosure. We also review our security procedures periodically to consider appropriate new technology, procedures, and updated methods.

We require our staff and any third parties who carry out any work on our behalf to comply with appropriate compliance standards including obligations to protect any information and apply appropriate security measures for the use and transfer of information. Even so, despite our reasonable efforts, no security measure is ever perfect or impenetrable.

We cannot guarantee the security of your personal information transmitted to our Site. Any transmission of personal information is at your own risk. We are not responsible for circumvention of any privacy settings or security measures contained on any of our Sites.

## **6. SHARING AND TRANSFER OF PERSONAL INFORMATION**

We do not share personal data with third parties, however, NASD may share your personal data in certain circumstances such as where necessary for our legitimate professional and business needs, to carry out your requests, and/or as required or permitted by law or professional standards, or with third-party service providers contracted by us. Such third-party service providers that we may share your personal data with are under an obligation to secure your details and use them strictly to fulfill the service for which they were contracted. When they no longer need your details to fulfill this service, the data will be disposed of in line with NASD's procedures and regulatory requirements.

## **7. RETENTION PERIOD**

NASD will in line with our data retention procedures, process and store the personal data we collect only for as long as required in the following instances.

- a. Where necessary to comply with legal, regulatory to which we are subject, internal business, or policy requirements.
- b. For the establishment, exercise, or defence of legal claims.

The period for which data is retained will depend on the specific nature and circumstances under which the information was collected; however, subject to the requirements of a)–b) above, personal information will not be retained for longer than legally required.

## **8. YOUR RIGHTS AS A DATA SUBJECT**

8.1. At any point, while we are in possession of or processing your personal data, you, the data subject, have the following rights:

- a. Right of access – you have the right to access the information we hold about you and how we process it.
- b. Right of rectification – you have a right to correct data that we hold about you that is inaccurate or incomplete.
- c. Right to be forgotten – in certain circumstances you can ask for the data we hold about you to be erased from our records.
- d. Right to restriction of processing – where certain conditions apply to have a right to restrict the processing.
- e. Right of portability – you have the right to have the data we hold about you transferred to another organization.
- f. Right to object – you have the right to object to certain types of processing and request that we restrict our processing in some circumstances.
- g. Right to object to automated processing, including profiling – you also have the right to be subject to the legal effects of automated processing or profiling.

8.2. You will not be required to pay a fee to access your personal data (or to exercise any of the above rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive, or excessive. Alternatively, we may refuse to comply with your request in these circumstances. In any event, you always have the right to lodge a complaint with the Nigeria Data Protection Commission or any other statutory body or establishment having government's mandate to deal solely or partly with matters relating to Personal Data.

8.3. We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

8.4. We endeavour to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made several requests. In this case, we will notify you and keep you updated.

8.5. If you wish to exercise any of the rights set out above, please reach us at the 'How to Contact Us' portion of this Policy.

## 9. AGE RESTRICTIONS

The Site is not intended for use by persons under the age of 18. NASD does not knowingly collect personal data from persons under the age of 18. If we learn that we have collected personal data from a person under the age of 18, we will delete that data from our systems permanently.

## 10. CHANGES TO THIS PRIVACY POLICY

NASD has the discretion to update this Policy at any time. When we do, we will revise the updated date at the bottom of this page. We encourage you to frequently check this page for any changes to stay informed about how we are helping to protect the personal information we collect. You acknowledge and agree that it is your responsibility to review this privacy policy periodically and become aware of modifications.

## YOUR ACCEPTANCE OF THESE TERMS

By using this Site, you signify your acceptance of this Policy and terms of service. If you do not agree to this Policy, please do not use our Site. Your continued use of the Site following the posting of changes to this policy will be deemed your acceptance of those changes.

## Contact Us

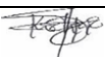
If you have any questions or suggestions regarding our privacy policy, please contact our Data Protection Officer using the contact us page on our website at:

9th Floor, UBA House,


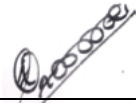
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Tel: 0902-455-9686

		Date of Approval	Signature
Revised By:	Head, Legal, and Compliance	February 21, 2024	



<b>Reviewed By:</b>	Managing Director	March 10, 2024	
<b>Approved By:</b>	Chairman, Governance and General Purposes Committee	March 10, 2024	
	Chairman, Board of Directors	April 30, 2024	