1. Introduction

This Privacy Policy is developed by FCSL (the Company) in compliance with the Nigerian Data Protection Act (NDPA) 2023 and other similar guidelines as well as a demonstration of the Company's commitment to providing its customers and other stakeholders with the highest level of protection of their personal data obtained in the course of interacting with the Company.

FCSL generally does not require you to give us personal information when using our website, and beyond the automatically collected data specified below and in our cookie policy, we do not collect personal information unless you provide us with such information.

2. Objective

This Privacy Policy has been put in place to:

a. Inform data subjects about their rights, responsibilities and privileges;
b. Ensure the protection of Client and other Stakeholder's information;
c. To ensure confidentiality as much as possible;
d. Take corrective action if wrongdoing is discovered;

3. Scope and Applicability

This Policy applies to all employees, clients and stakeholders of the Company. This policy highlights the basis on which personal data collected from Clients and other stakeholders shall be processed by the Company. This policy applies to the Company's website and physical contact with the Company regardless of how you access or use them. By continuing to visit our website, users of the website accepts and consent to the practices described in this policy.

4. Interpretation

i. **Personal Data** This means any information relating to an identified or identifiable natural persons (Data Subject); an identifiable natural person is one who can be identified, directly or indirectly.

ii. **Data Subject** This refers to all person who can be identified, directly or indirectly, via an identifier such as a name, an ID Number, Location data, etc.

iii. **Personal Identifiable Information (PII)** This means information that can be used on its own or with other information to identify, contact or locate a single person, or to identify an individual In a context

iv. **Processing** This means any operation or set of operations which is performed on personal data or sets of personal data, whether or not by automated means, such as collection, recording, use, disclosure by transmission, etc.

5. Responsibility of Data Subject

a. Usernames, identification codes, passwords, or any other piece of information used as part of our access security measures must be treated as confidential, and must not be disclosed to any third party

b. We reserve the right to disable any user identification code or password, whether chosen or allocated by the Company at any time, if in the Company's opinion, there has been non-compliance with any of the provisions of this privacy policy.

c. All enquires, complaints or suspicion of a data breach should be forwarded to dpo@fcslng.com

6. Consent

When you input your personal information on FCSL's form either physically or via the website, you are deemed to have authorised us to collect, store and use your personal information in accordance with this privacy policy. The website issues cookies when you access the website. By using the website, you consent to us using cookies in line with the provision of this policy.

Use/Processing of Data Subject's Data

FCSL collects both personal and sensitive information during onboarding; either physically or electronically and when you use our website. We collect information such as website visits, identification documents(driver's license, BVN, NIN, Passport, etc), bank account details, documents reflecting personal information such as name, address, passport details, identification numbers, telephone number, occupation as is necessary. In the course of carrying out our due diligence as required by our Regulators, we may also use information obtained from third parties such as friends, employers, regulators, and publicly available sources such as the press, public search engines, etc.

The Company will only collect personal data in other to give efficient, enjoyable, and secure services. We may collect your data for the following purposes;

S/N	PURPOSE OF COLLECTION	TYPE OF DATA	LAWFUL BASIS
1	REGULATORY ACTIONS	All information contained in the account opening forms and customer mandates	LEGAL OBLIGATION
2	NOTIFICATIONS	Name, Phone, Email Address, Contact Address and financial records	CONSENT
3	DATA ANALYTICS	Information is anonymised	LEGITIMATE INTEREST
4	SECURITY	Video Footage	PUBLIC INTEREST/ LEGITIMATE INTREST
5	EMPLOYMENT	Name, Phone, Email Address, Contact Address, Sex, Date of Birth, passport, medical record, educational record.	CONTRACT
6	CONTRACT	All information contained in the registration forms	CONTRACT
7	VERIFICATION	Name, date of birth and contact address	Legitimate Interest/ Legal Obligation

7. Third-Party Disclosure

As a policy, the Company does not share its Clients or other stakeholder's information with third parties (unless with prior obtained approval) except for website hosting partners and other parties who assist us in operating our website, conducting our business, or servicing you. We may also disclose the personal information of Data subjects under Regulatory requirements.

By virtue of the Confidentiality and privacy clause contained in contracts executed with third-party Vendors, such vendors are bound to keep confidential information that may be disclosed in the course of carrying on their duties with FCSL.

8. Rights of Data Subjects

Your information is regarded as confidential and will not be divulged to any third party, except under legal and/or regulatory conditions. Your rights with regards to your data is as listed below;

a. Right of Access: You have the right to request sight of, and copies of any and all information we keep on you. The exemptions to this right are as listed below;

i. Information about other people
ii. Where a similar or identical request in relation to the same data subject has previously been complied with within a reasonable period
iii. When there is no significant change in personal data
iv. Publicly available information
v. Requests are repetitive and unnecessary
vi. The means of retrieve such data is excessively difficult or time consuming

b. Right to Rectification: You also have the right to request for the correction of information we keep on you.

c. Right to Restriction of Processing: You have the right to limit the extent of processing your data. However, such restrictions may limit the services rendered to you to the extent consented to.

d. Right to Erasure: Upon the receipt of the request that your data be deleted or forgotten. This right is however subject to the provision of the rules of the Securities and Exchange Commission (SEC) and the Nigerian Data Protection Commission (NDPC).

While the Company is responsible for safeguarding the information entrusted to us, you are also required to practice appropriate security measures such as non-sharing of passwords and other platform login details, adherence with physical security protocols on our premises and dealing with only authorized officers of the Company

9. Cookies

Cookies are small text files stored on your computer or mobile devices whenever you visit a website. Cookies have many uses, such as memorizing your preferences so as to tailor your experiences while on our site– or to help us analyse our website traffic.
The Company uses cookies to improve your experience while on its website. We would like to let you know a few things about our cookies:

- Some cookies are essential to access certain areas of our website;
- We use analytics cookies to help us understand how you use our site to discover what content is most useful to you

Why and How We Use Cookies on Our Website

We use cookies to improve your online activity session by making navigation easier and providing important security features.

When You access the Service by or through a mobile device, We may collect certain information automatically, including, but not limited to, the type of mobile device you use, Your mobile device's unique ID, the IP address of Your mobile device, Your mobile operating system, the type of mobile Internet browser you use, unique device identifiers and other diagnostic data. We may also collect information that your browser sends whenever you visit our Service or when you access the Service by or through a mobile device.

We use cookies to track the activity on Our Service and store certain information

We use Google Analytics to collect the following types of information from users who have JavaScript enabled on their browsers:

- Web browser used – software manufacturer, and version number
- Operating system
- Screen colours
- JavaScript support
- Flash version
- Screen resolution
- Network location and IP address
- Geographic data
- Hostname
- Connection bandwidth
- Time of visit
- Pages visited and dwell time on these pages
- Referring site
  - The referring website URL
  - Search engine query used

Cookie Category

Some cookies are required to make our website work, but we need your consent to use others. The cookie categories are:

Category	Description
Strictly Necessary	These cookies are required to run our website, to keep it secure, and to obey regulations that apply to us. These cookies are essential even if a customer declines the collection of cookies.
Functional	These cookies remember your region or country, language, accessibility options, and your settings.
Performance	These cookies tell us how customers use our website. We study and profile this data to help us improve our products and performance
Marketing	These cookies help us decide which products, services, and offers may be relevant for you. We may use this data to tailor the ads you see on our own and other websites and apps.

What are your choices regarding cookies?

You can choose to have your computer warn you each time a cookie is collected, or you can choose to turn off all cookies. Since browsers differ, we recommend that you access the Help Menu to learn the correct way to modify your cookies.

If you turn your cookies off, some of the features that make your site, experience more efficient may not function properly.