



ANCHORIA ASSET MANAGEMENT LIMITED

DATA PRIVACY AND PROTECTION POLICY

The purpose of this document (“ANCHORIA ASSET MANAGEMENT LTD Data Protection Policy”) is to inform the public of how Anchoria Asset Management Ltd manages Personal Data (as defined below) which is subject to the Nigeria Data Protection Regulation 2019.

The public is expected to read this Data Privacy and Protection Policy so that you know and understand the purposes for which we collect, use, and disclose Personal Data.

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Consent

By interacting with us, filling out forms/registers (both online and offline), submitting information to us, or signing up for any products or services offered by us, the user agrees and consent to Anchoria Asset Management Ltd, as well as our respective representatives and/or agents (“Representatives”) (the Companies and Representatives collectively referred to herein as “Anchoria Asset Management Ltd”, “us”, “we” or “our”) collecting, using, disclosing and sharing amongst ourselves your Personal Data, and disclosing such Personal Data to the Companies’ authorised service providers and relevant third parties in the manner outlined in this Data Protection Policy.

This Data Protection Policy supplements but does not supersede nor replace any other consents you may have previously provided to Anchoria Asset Management Ltd in respect of your Personal Data, and your consents herein are additional to any rights which any of the Companies may have at law to collect, use, or disclose your Personal Data.

Anchoria Asset Management Ltd may from time to time update this Data Protection Policy to ensure that this Data Protection Policy is consistent with our future developments, industry trends and/or any changes in legal or regulatory requirements. Subject to your rights at law, you agree to be bound by the prevailing terms of the Data Protection Policy as updated from time to time on our website. Please check regularly for updated information on the handling of your Personal Data.

Personal Data



In this Data Protection Policy, “Personal Data” refers to any data, whether true or not, about an individual who can be identified (a) from that data; or (b) from that data and other information to which we have or are likely to have access, including data in our records as may be updated from time to time.

Examples of such Personal Data you may provide to us include (depending on the nature of your interaction with us) your name, bank verification number, passport or other identification numbers, telephone number(s), mailing address, email address, transactional data and any other information relating to any individuals which you have provided us in any form you may have submitted to us (including in the form of biometric data), or via other forms of interaction with you.

Collection of Personal Data

Generally, we collect Personal Data in the following ways:

- when you interact with us using our various social media platforms and/or through our online electronic messaging and chat option like Emails, WhatsApp etc.
- when you enter into any agreement or provide other documentation or information in respect of your interactions with us, or when you use our services.
- when you interact with our staff, including relationship managers and their assistants, example via telephone calls (which may be recorded), letters, fax, face-to-face meetings, electronic meetings, and emails.
- when your images are captured by us via closed-circuit television cameras (“CCTVs”) while you are within our premises, or via photographs or videos taken by us or our representatives when you attend events hosted by us.
- when you use some of our services provided through online and other technology platforms, such as websites and apps, including when you establish any online accounts with us.
- when you request that we contact you or include you in an email or other mailing lists; or when you respond to our request for additional Personal Data, our promotions, and other initiatives.
- when you are contacted by, and respond to, our marketing representatives, agents, and other service providers.
- when we seek information about you and receive your Personal Data from third parties in connection with your relationship with us, for example, from referrers, business partners, external or independent asset managers, public agencies, or the relevant authorities.
- through physical access, internet, and information technology monitoring processes.
- in connection with any investigation, litigation, registration or professional disciplinary matter, criminal prosecution, inquest or inquiry which may relate to you or any Connected Person; and/or.
- when you submit your Personal Data to us for any other reason.

When you browse our website and platforms, you generally do so anonymously but please see the section below on cookies. We do not, at our website and platforms, automatically collect Personal Data, including your email address unless you provide such information or login with your account credentials.

If you provide us with any Personal Data relating to a third party (for example, information of your spouse, children, parents, or a Connected Person), by submitting such information to us, you represent to us that you have obtained the consent of the third party to you providing us with his/her Personal Data for the respective purposes. “Connected Person” may include but is not limited to any beneficial owner, authorised signatory, director, shareholder, an officer of a company, partner or member of a partnership, settlor, trustee, beneficial owner, protector or grantor of trust, mandate holder, power of attorney holder, surety, third party security provider,



provider of funds, founder and/or employee, the payee of designated payment, representatives, agents, or nominees.

You should ensure that all Personal Data submitted to us is complete, accurate, true, and correct. Failure on your part to do so may result in our inability to provide you with the products and services you have requested. You agree to inform Anchoria Asset Management Ltd immediately of any change of facts or circumstances which may render any information or Personal Data previously provided inaccurate, untrue, or incorrect and provide any information or documentation as Anchoria Asset Management Ltd may reasonably require for verifying the accuracy of the updated information or Personal Data.

Purposes for the Collection, Use and Disclosure of Your Personal Data

Generally, Anchoria Asset Management Ltd, uses and discloses your Personal Data for the following purposes:

- Purposes for the Collection, Use and Disclosure of Your Personal Data Generally, Anchoria Asset Management Ltd, uses and discloses your Personal Data for the following purposes: responding to, processing, and handling your complaints, queries, requests, feedback, and suggestions.
- verifying your identity and customer due diligence
- managing the administrative and business operations of Anchoria Asset Management Ltd and complying with internal policies and procedures (including but not limited to facilitating business continuity planning).
- facilitating business asset transactions (which may extend to any mergers, acquisitions, or asset sales) involving any of the group members; matching any Personal Data held which relates to you for any of the purposes listed herein.
- resolving complaints and handling requests and enquiries.
- preventing, detecting, and investigating crime, including fraud and money-laundering or terrorist financing, and analysing and managing commercial risks (including but not limited to preventing and detecting loss of Anchoria Asset Management Ltd proprietary and sensitive information).
- project management.
- providing media announcements and responses, for example in relation to complaints or lawsuits.
- requesting feedback or participation in surveys, as well as conducting market research and/or analysis for statistical, profiling, or other purposes for us to design our products, understand customer behaviour, preferences, and market trends, and to review, develop and improve the quality of our products and services.
- managing the safety and security of our premises and services (including but not limited to carrying out CCTV surveillance and conducting security clearances);
- managing and preparing reports on incidents and accidents.
- organising events, seminars, or training.
- to assist in law enforcement and investigations by relevant authorities.
- in connection with any claims, actions, or proceedings (including but not limited to drafting and reviewing documents, transaction documentation, obtaining legal advice, and facilitating dispute resolution), and/or protecting and enforcing our contractual and legal rights and obligations.
- archival management (including but not limited to warehouse storage and retrievals).
- complying with any applicable rules, laws and regulations, codes of practice or guidelines, obligations, requirements, or arrangements for collecting, using and disclosing Personal Data that apply to Anchoria Asset Management Ltd or that it is expected to comply, according to:

- a. any law binding or applying to it within or outside Nigeria existing currently and in the future.
 - b. any guidelines or guidance given or issued by any legal, regulatory, governmental, tax, law enforcement or other authorities, or self-regulatory or industry bodies or associations of financial services providers within or outside Nigeria existing currently and in the future.
 - c. any present or future contractual or other commitment with local or foreign legal, regulatory, governmental, tax, law enforcement or other authorities, or self-regulatory or industry bodies or associations of financial services providers that is assumed by or imposed on Anchoria Asset Management Ltd because of its financial, commercial, business, or other interests or activities in or related to the jurisdiction of the relevant local or foreign legal, regulatory, governmental, tax, law enforcement or other authorities, or self-regulatory or industry bodies or associations; and/or
- any other purpose relating to any of the above.

These purposes may also apply even if you do not maintain any account(s) with us or have terminated these account(s).

Also, Anchoria Asset Management Ltd collects, uses and discloses your Personal Data for the following purposes depending on the nature of our relationship:

- If you are a prospective customer:
 - a. valuating your eligibility to open an account with us and your financial and banking needs and providing recommendations to you as to the type of products and services suited to your needs.
 - b. assessing and processing any applications or requests made by you for products and services offered by Anchoria Asset Management Ltd.
 - c. and/or any other purpose relating to any of the above.
- If you are a customer and/or holding an account with Anchoria Asset Management Ltd or a Connected Person or an administrator, executor, liquidator, official assignee, receiver, judicial manager, or other similar officials who have been so appointed in pursuant to bankruptcy or insolvency proceedings instituted in Nigeria or elsewhere in respect of a Anchoria Asset Management Ltd customer or any security provider:
 - a. opening, maintaining, or closing of accounts and our establishing or providing banking and trust services to you.
 - b. processing fund transfers or any other instructions provided concerning the account of a Anchoria Asset Management Ltd customer.
 - c. where account or relationship managers or agents have been assigned to service your account or portfolio, using your telephone number(s) to contact you from time to time to take your instructions, and/or provide you with information, updates, or recommendations and/or in accordance with the terms and conditions of our agreement with you.
 - d. processing applications for and facilitating the daily operation of services and credit facilities provided to you or other persons or corporations for whom you act as surety or third-party service provider.
 - e. conducting credit checks at the time of application for credit and at the time of regular or special credit reviews.

- f. facilitating or processing your application for investment products and/or other services offered by Anchoria Asset Management Ltd and its business partners.
 - g. carrying out client reviews, for example, annual reviews of your portfolio.
 - h. to establish your financial situation, risk profile, investment experience and investment objectives to help you consider the suitability of the products you have invested or intend to invest.
 - i. providing internet banking services (including but not limited to carrying out special handling requests for PIN mailers and tokens).
 - j. networking to maintain customer relationship.
 - k. providing client servicing (including but not limited to responding to individual requests by customers, mailing services, reconciliation services and providing customer satisfaction).
 - l. facilitating the transfer of funds within Anchoria Asset Management Ltd accounts or from Anchoria Asset Management Ltd accounts to external banking accounts and vice versa.
 - m. administering exceptional approvals, fee adjustments or waivers.
 - n. dealing with and designing investment products (for example, bonds, derivatives, equities, funds).
 - o. registering the pledge or charge that you or the surety or the third-party security provider has granted in favor of Anchoria Asset Management Ltd as security for the credit facilities granted by Anchoria Asset Management Ltd to you.
 - p. administering credit and debit cards (including but not limited to processing card applications, transactions, and credit limit approvals).
 - q. providing cheque deposits and issuance services.
 - r. determining and collecting amounts owed by you or the borrower for whom you act as surety or third-party security provider or those providing security or acting as surety for your liabilities and obligations.
 - s. enabling any Company or third party to perform the functions that Anchoria Asset Management Ltd may have outsourced to it concerning the management of your account or transactions.
 - t. enabling an actual or proposed assignee of Anchoria Asset Management Ltd, or participant or sub-participant or transferee of Anchoria Asset Management Ltds' rights, liabilities, or obligations in respect of (1) you or (2) a security provider who provides security or acts as surety for your liabilities and obligations to evaluate the transaction intended to be the subject of the assignment, participation, sub-participation, or transfer; and/or
 - u. any other purpose relating to any of the above.
- If you are an employee or agent of a referrer or other intermediary:
 - a. marketing services and products.
 - b. processing commission remuneration.
 - c. performing due diligence and reference checks; and/or
 - d. any other purpose relating to any of the above.
 - If you are an employee, officer or owner of an external service provider or vendor outsourced or prospected by Anchoria Asset Management Ltd.
 - a. managing project tenders or the supply of goods and services.
 - b. processing and payment of vendor invoices.
 - c. complying with any applicable rules, laws and regulations, codes of practice or guidelines or to assist in law enforcement and investigations by relevant

- authorities (which includes disclosure to regulatory bodies or audit checks); and/or
- d. any other purpose relating to any of the above.
- If you are a party or counterparty to a transaction (for example, a beneficiary of a fund transfer or payment):
 - a. providing cash, payment, and transactional services (including but not limited to the execution, settlement, reporting and/or clearing of the relevant transaction); and/or
 - b. any other purpose relating to any of the above.
 - If you sit on the Anchoria Asset Management Ltd Board of Directors:
 - a. facilitating appointment to the Board (including but not limited to managing the publication of directors' statistics on annual reports and circulars)
 - b. complying with any applicable rules, laws and regulations, codes of practice or guidelines or to assist in law enforcement and investigations by relevant authorities (including but not limited to disclosures to regulatory bodies or conducting due diligence).
 - c. administrative matters (including but not limited to the maintenance of statutory registers and lodgments of directors' fee).
 - d. any other purpose relating to any of the above.

Also, where permitted under the regulation, Anchoria Asset Management Ltd may also collect, process, use and disclose your Personal Data for the following purposes (which we may describe in our documents and agreements as "Additional Purposes" for the handling of Personal Data):

- providing or marketing services, products, and benefits to you, including promotions, loyalty, and reward programmes.
- matching Personal Data with other data collected for other purposes and from other sources (including third parties) in connection with the customization, provision or offering of products and services, marketing, or promotions, whether by Anchoria Asset Management Ltd or other third parties.
- sending you details of products, services, special offers and rewards, investment or research reports or guides, either to our customers generally, or which we have identified may be of interest to you; and/or
- conducting market research, understanding, and analyzing customer behavior, location, preferences, and demographics for us to offer you products and services as well as special offers and marketing programmes which may be relevant to your preferences and profile.

If you have provided your telephone number(s) and have indicated that you consent to receive marketing or promotional information via your telephone number(s), then from time to time, Anchoria Asset Management Ltd may contact you using such telephone number(s) (including via voice calls, text, or other means) with information about our products and services (including discounts and special offers).

In relation to products or services or your interactions with us, we may also have specifically notified you of other purposes for which we collect, use or disclose your Personal Data. If so,



we will collect, use, and disclose your Personal Data for these additional purposes as well, unless we have specifically notified you otherwise.

Anchoria Asset Management Ltd will collect and process your Personal Data in accordance with the legitimate purposes consented to by you provided that further processing may be done for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes as provided for in the Data Protection Regulation.

Disclosure of Personal Data

Anchoria Asset Management Ltd will take reasonable steps to protect your Personal Data against unauthorized disclosure. Subject to the provisions of any applicable law, your Personal Data may be provided, for the purposes listed above (where applicable), to the following entities or parties, whether they are located overseas or in Nigeria:

- Anchoria Asset Management Ltd related corporations and overseas branches and offices.
- counterparties and their respective banks concerning transactions for your account including purchasing and selling of securities and investment products, fund transfers, payments, issuance of standby letters of credit, banker's guarantees or letters of undertaking and drawing of payment instruments.
- third party recipients of reference letters.
- companies providing services relating to insurance and/or reinsurance to Anchoria Asset Management Ltd.
- insurers or brokers concerning the insurance products or services that you have applied for or purchased.
- trustees, attorneys, and asset managers appointed by you to manage your account held with Anchoria Asset Management Ltd.
- referrers who have referred you to Anchoria Asset Management Ltd.
- any person (1) who provides security or acts as surety for your liabilities and obligations to Anchoria Asset Management Ltd or (2) for whom you act as surety or third-party security provider.
- agents, contractors, vendors, installers, or third-party service providers who provide administrative or operational services to Anchoria Asset Management Ltd, such as courier services, telecommunications, information technology, payment, payroll, processing, training, market research, storage, archival, customer support investigation services or other services to Anchoria Asset Management Ltd.
- Our service providers: Anchoria Asset Management Ltd use other companies, agents, or contractors to perform services on our behalf or to assist us with the provision of our services and products to you, including:
 - a. infrastructure and IT service providers, including cloud storage for data, email archiving etc.
 - b. marketing, advertising, and communications agencies.
 - c. credit reference agencies
 - d. external auditors and advisers.
 - e. offsite archival storage providers.
- While providing such services, these service providers may have access to your personal information. However, we will only provide our service providers with personal information which is necessary for them to perform their services, and we require them

not to use your information for any other purpose. We will use our best efforts to ensure that all our service providers keep your personal information secure.

- agents, contractors, vendors, or other third-party service providers in connection with marketing, products and services offered by ANCHORIA ASSET MANAGEMENT LTD.
 - analytics, search engine providers or third-party service providers that assist us in delivering our products, services, websites, and platforms as well as improving and optimizing the same.
 - credit reporting agencies.
 - debt collection agencies.
 - your employers which are financial institutions, for their internal surveillance or monitoring purposes.
 - any business partner, investor, assignee, or transferee (actual or prospective) to facilitate business asset transactions (which may extend to any merger, acquisition or any debt or asset sale) involving any of the Companies.
 - credit companies and their respective service providers in respect of credit cards held by you.
 - our professional advisers such as our auditors and lawyers.
 - third parties who provide corporate advisory services or due diligence services in connection with you, any Connected Person or your account held with Anchoria Asset Management Ltd
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- relevant government regulators, government agencies/ministries, statutory boards or authorities or law enforcement agencies who have jurisdiction over Anchoria Asset Management Ltd or any Company or any transaction entered into by you, such as the Securities and Exchange Commission (SEC), Central Bank of Nigeria (CBN), Nigerian Stock Exchange (NSE), Lagos Commodities and Futures Exchange (LCFE) and other exchanges for which we relate, as well as to comply with listing and other requirements or directions of these exchanges and/or any other relevant securities exchange;
 - any liquidator, receiver, administrator, judicial manager, trustees-in-bankruptcy, custodian, or other similar officials who have been so appointed, pursuant to bankruptcy, winding-up or insolvency proceedings instituted in Nigeria or elsewhere, in respect of you or your assets.
 - third parties who carry out registration of charge or pledge over the assets that you have pledged or charged to Anchoria Asset Management Ltd.
 - corporate service providers or lawyers, who are appointed by you.
 - surveyors or valuers or other third parties in relation to assets which you will be charging or mortgaging to Anchoria Asset Management Ltd.
 - financial institutions, brokerage houses, clearing houses, depository, depository agents, warehouses, managers, administrators, fund houses, registrars, custodians, external banks, the Central Depository, nominee banks and investment vehicles in relation to asset management and investment product settlement processing.
 - collection and repossession agencies concerning the enforcement of repayment obligations for loans.
 - third parties who organize promotional or marketing events, seminars, or training.
 - any actual or proposed assignee or participant or sub-participant or transferee of ANCHORIA ASSET MANAGEMENT LTDs' rights, liabilities or obligations in respect of (1) you or (2) a security provider who provides security or acts as surety for your liabilities and obligations to evaluate the transaction intended to be the subject of the assignment, participation, sub-participation or transfer.
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- any person to whom Anchoria Asset Management Ltd or any of the Companies is under an obligation or otherwise required to make disclosure under the requirements

of any law binding on or applying to Anchoria Asset Management Ltd or any of the Companies, or any disclosure under and for the purpose of any guidelines or guidance given or issued by any legal, regulatory, governmental, tax, law enforcement or other authorities, or self-regulatory or industry bodies or associations of financial services providers with which Anchoria Asset Management Ltd or any of the Companies are expected to comply, or any disclosure in pursuant to any contractual or other commitment of Anchoria Asset Management Ltd or any of the Companies with local or foreign legal, regulatory, governmental, tax, law enforcement or other authorities, or industry bodies or associations of financial services providers, all of which may be within or outside Nigeria and maybe existing currently and in the future; and/or

- any other party to whom you authorize us to disclose your Personal Data to.

Use of Cookies and Related Technologies

Our websites and platforms use cookies and other technologies. Cookies are small text files stored in your computing or other electronic devices when you visit our website and platforms for record-keeping purposes. Cookies are stored in your browser's file directory, and the next time you visit the website or platform, your browser will read the cookie and relay the information back to the website, platform or element that originally set the cookie. Depending on the type of cookie it is, cookies may store user preferences and other information.

Web beacons (also known as pixel tags and clear GIFs) involve graphics that are not apparent to the user. Tracking links and/or similar technologies consist of a few lines of programming code and can be embedded in our websites or platforms. Web beacons are usually used in conjunction with cookies and primarily used for statistical analysis purposes. This technology can also be used for tracking traffic patterns on websites and platforms, as well as finding out if an e-mail has been received and opened and to see if there has been any response.

We may employ cookies and other technologies as follows:

- tracking information such as the number of visitors and their frequency of use, profiles of visitors and their preferred sites.
- making our websites and platforms easier to use. For example, cookies may be used to help speed up your future interactions with our websites and platforms.
- to better tailor our products and services to your interests and needs. For example, cookies information may be identified and disclosed to our vendors and business partners to generate consumer insights.
- collating information on a user's search and browsing history.
- when you interact with us on our websites and platforms, we may automatically receive and record information on our server logs from your browser. We may collect for the purpose of analysis, statistical and site-related information including, without limitation, information relating to how a visitor arrived at the website or platform, the browser used by a visitor, the operating system a visitor is using, a visitor's IP address, and a visitor's clickstream information and time stamp (which may include, for example, information about which pages they have viewed, the time the pages were accessed and the time spent per web page);
- using such information to understand how people use our websites and platforms, and to help us improve their structure and contents.
- using cookies that are necessary to enable our websites and platforms to operate, for example, cookies that enable you to log into secure parts of our websites and platforms; and/or



- personalizing the website and platform for you, including delivering advertisements which may be of particular interest to you and using cookie-related information to allow us to understand the effectiveness of our advertisements.

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Some cookies we use are from third party companies to provide us with web analytics and intelligence about our websites and platforms. These companies collect information about your interaction with our websites and platforms. We use such information to compile statistics about visitors who interact with the websites, platforms, and other online content, to gauge the effectiveness of our communications, and to provide more pertinent information to our visitors.

If you do not agree to such use of cookies, you can adjust your browser settings. Unless you have adjusted your browser settings to block cookies, our system will issue cookies as soon as you visit our site or click on a link in a targeted email that we have sent you, even if you have previously deleted our cookies. How cookies can be managed depends on your browser. Please visit the sites of your web browser on information on how to configure or disable cookies in each browser. If you do not agree to our use of cookies and other technologies as set out in this Data Protection Policy, you should delete or disable the cookies associated with our websites and platforms by changing the settings on your browser accordingly. However, you may not be able to enter certain part(s) of our websites or platforms. This may also impact your user experience while on our websites or platforms.

Data Security

Anchoria Asset Management Ltd will take reasonable efforts to protect Personal Data in our possession or our control by making reasonable security arrangements to prevent unauthorized access, collection, use, disclosure, copying, modification, disposal, or similar risks. However, we cannot completely guarantee the security of any Personal Data we may have collected from or about you, or that for example, no harmful code will enter our website (for example viruses, bugs, trojan horses, spyware, or adware). You should be aware of the risks associated with using websites and take any necessary precautions.

We have implemented technical and organizational security measures to safeguard the personal information in our custody and control. Such measures include, for example, limiting access to personal information only to employees and authorized service providers who need to know such information for the purposes described in this policy; adopting security protocols on networks and systems; using email security settings when sending and/or receiving highly confidential emails; applying physical access controls such as marking confidential documents clearly and prominently, storing confidential documents in locked file cabinets; restricting access to confidential documents on a need-to-know basis; using privacy filters; disposal of confidential documents that are no longer needed, through shredding or similar means; using a mode of delivery or transmission of personal data that affords the appropriate level of security (e.g. registered post instead of the normal post where appropriate); confirming the intended recipient of personal data as well as other administrative, technical and physical safeguards.

While we endeavor to protect our systems, sites, operations and information against unauthorized access, use, modification, and disclosure, due to the inherent nature of the Internet as an open global communications vehicle and other risk factors, we cannot guarantee that any information, during transmission or while stored on our systems, will be safe from intrusion by others, such as hackers. We engage various forms of security method like Encryption, Backup and Recovery and Access control, all together put in place to ensure



the authentication of users and protection against data breaches. Our web servers are secured under a strong security system with our trained and trusted IT workforce who work hand in hand to ensure confidentiality of data of clients in accordance to our laid down procedures and compliance with the Nigeria Data Protection Regulation.

While we strive to protect your Personal Data, we cannot ensure the security of the information you transmit to us via the Internet or electronic communication or when you use our electronic services, and we urge you to take every precaution to protect your Personal Data when you use such platforms. We recommend that you change your passwords often, use a combination of letters and numbers, and ensure that you use a secure browser.

If applicable, you undertake to keep your username, password and/or pin secure and confidential and shall not disclose or permit it to be disclosed to any unauthorized person, and to inform us as soon as reasonably practicable if you know or suspect that someone else knows your username and password or believe the confidentiality of your username and password has been lost, stolen or compromised in any way or that actual or possible unauthorized transactions have taken place. We are not liable for any damages resulting from any security breaches, on unauthorized and/or fraudulent use of your username and password.

Third-Party Sites

Our website may contain links to other websites operated by third parties. We are not responsible for the privacy practices of websites operated by third parties that are linked to our website. We encourage you to learn about the privacy policies of such third-party websites. Some of these third-party websites may be co-branded with our logo or trademark, even though they are not operated or maintained by us. Once you have left our website, you should check the applicable privacy policy of the third-party website to determine how they will handle any information they collect from you.

Data Retention

We will only retain your personal data for as long as necessary for the purpose for which that data was collected and to the extent permitted by applicable laws. In general, we will keep your personal data for between five (5) to ten (10) years (depending on the type of information, and in accordance with our internal policies) after your relationship with us is terminated. However, there may be circumstances that mean we must retain your personal information for longer. To determine how long it is necessary to retain your personal information, we calculate retention periods in accordance with the following criteria:

- the currency of your relationship with us and the types of products or services you have with us.
- the length of time it is reasonable to keep records to demonstrate that we have fulfilled our obligations to you and under the law.
- any limitation periods within which claims might be made.
- any retention periods prescribed by law or recommended by regulators, industry bodies or associations; and



- the existence of any relevant proceedings.

Children's Privacy

Our services are not intended to be provided directly to children without parental consent. We will never knowingly collect personal information from individuals under the age of eighteen (18) years without first obtaining verifiable parental consent. If you are under the age of 18 you should not provide information to us. If we become aware that a person under 18 has provided personal information to us without verifiable parental consent, we will remove such personal information from our files.

Your Rights

The data protection laws provide individuals with the following rights:

- Right of subject access: The right to make a written request for details of personal information we hold about you and to request a copy of that personal information.
- Right to rectification: The right to have inaccurate information about you rectified.
- Right to erasure ('right to be forgotten'): The right to have certain personal information about you erased.
- Right to restriction of processing: The right to request that your personal information is only used for restricted purposes.
- Right to object: The right to object to the use of personal information (including the right to object to marketing).
- Right to data portability: The right to ask for the personal information you have made available to us to be transferred to you or a third party in machine-readable formats.
- Right to withdraw consent: You have the right to withdraw any consent you have given us to handle your personal information. If you withdraw your consent, this will not affect the lawfulness of the use of your personal information before the withdrawal of your consent. These rights may not apply in all cases. If we are not able to comply with your request, we will explain why. In response to a request, we will ask you to verify your identity if we need to and to provide information that helps us to understand your request better. If you would like more information about your rights or to exercise any of your rights, please contact with the details below.
- Right to lodge a complaint with a supervising authority: You have the right to lodge a complaint with the National Information Technology Development Agency or a Data Protection Compliance Organization licensed by the Agency.

Contacting Us – Feedback, Withdrawal of Consent, Access, and Correction of your Personal Data

If you:

have any questions or feedback relating to your Personal Data or our Data Protection Policy would like to withdraw your consent to any use of your Personal Data as set out in this Data Protection Policy; or would like to obtain access and make corrections to your Personal Data records, please contact us as follows:

Email:	info@anchoriaam.com
Phone No:	09087482181



Address:

Anchoria Asset Management Limited,
12th Elephant House,
214, Broad Street, Marina, Lagos Island.

Please note that if your Personal Data has been provided to us by a third party, you should contact that such party directly to make any queries, feedback and access and correction requests to Anchoria Asset Management Ltd on your behalf.

If you withdraw your consent to any or all use of your Personal Data, depending on the nature of your request, Anchoria Asset Management Ltd or any of the Companies may not be able to continue to provide its products or services to you or administer any contractual relationship in place. A withdrawal of consent may also result in the termination of any agreements you have entered with Anchoria Asset Management Ltd or any of the Companies, and your being in breach of your contractual obligations or undertakings, and Anchoria Asset Management Ltd or the Company's legal rights and remedies in such event are expressly reserved.