



VETIVA CAPITAL MANAGEMENT LIMITED

PRIVACY POLICY

1. Introduction/Scope

This Privacy Policy is prepared in accordance with the provisions of the Nigerian Data Protection Act (NDPA) and, by extension, the EU General Data Protection Regulation (GDPR) and. It sets out how Vetiva Capital Management Limited and its subsidiaries (Vetiva Advisory Services Limited, Vetiva Fund Managers Limited, Vetiva Securities Limited and Vetiva Trustees Limited – collectively called “Vetiva”) apply and comply with the principles of the regulations in processing the personal data of individuals, clients, vendors, and even third parties that interact with Vetiva.

For personal data of individuals, this document also highlights their rights and covers the data subject(s) whose personal data is collected and processed in compliance with the NDPA.

2. Roles and Responsibilities

Vetiva’s Data Protection Officer (DPO) is responsible for ensuring that this document is correct and up-to-date. The DPO also ensures that data subjects are duly notified prior to the collection and processing of their personal data by Vetiva, including data collected via the Vetiva’s website. All Vetiva employees/staff who interact with personal data must also ensure to follow the provisions in this policy document.

3. Policy Statement

3.1 Who We Are

Vetiva is a group of capital market operators. We provide financial services in the capacity of Issuing House/Financial Advisers, Fund/Portfolio Managers, Broker-Dealer and Trustees.

Due to the nature of Vetiva’s business and the fact that Vetiva provides financial services across the country, Vetiva is mandated to collect and process personal data of its clients.

3.2 What Personal Data Do We Need?

The personal data we would collect and process, depending on the particular processing requirement, are under the following categories:

Personal Data Type	Sources
Identity Data	Full Name, maiden name, marital status, title, biometric information, national identification number (NIN), passport details, driver’s licence details, date of birth, gender, address, employment details and citizenship.
Contact Data	Address, Email Address and Telephone Numbers

	Information received during contact with face-to-face meetings, phone calls, emails, letters and SMS
Financial Data	Bank account information, Bank verification Number (BVN), income and outgoings, financial position, status and account number.
Technical Data	Internet protocol (IP) address, login data, details of browser and operating system, time zone setting and location, browser plug-in types and versions, platforms and other technology such as device id, geolocation, IP, model and user agent on the devices used to access Vetiva's website.
Profile Data	Includes username and password.
Job Application Data	Data submitted throughout the recruitment process e.g. name, email address. Any personal information you provide to Vetiva as part of the recruitment process.
Usage Data	Includes information about how data subject uses our website, products and services.
Marketing and Communications Data	Information about data subject communications with Vetiva. Preferences in receiving marketing e-mails and consents given by data subject to Vetiva.
Others	CCTV/Video footage whenever you come into our premises and telephone conversations via calls made through any of our contact centre lines.

Where the personal data we need to collect may fall under a special category of sensitive personal data, our lawful basis of processing will be the explicit consent of the data subject, compliance with a legal obligation, or for legal proceedings/advice.

3.3 Why Do We Need the Data?

Vetiva ensures that the personal data collected and processed is necessary for the purpose of collection and shall not collect or process more data than is reasonably required for a particular

processing activity. In addition, every processing purpose has at least one lawful basis for processing to safeguard the rights of the data subjects, as listed below:

Purpose of Processing	Lawful Basis of Processing
Account creation, identity verification and maintenance of records	Compliance with a legal obligation in which Vetiva is subject/contract.
Vendor validation/information processing	Contract
Employment	Contract

Where Legitimate Interest is considered the legal basis for processing personal data, Vetiva shall follow the steps below in carrying out a Legitimate Interest Assessment.

1. Determine the Purpose for Processing

In carrying out the purpose test, Vetiva will establish the exact reason for the processing and how it benefits the organisation. Answers to the following shall be provided to determine the exact purpose for processing:

- Description of the processing objective
- The likelihood of meeting the objective and how to determine if the objective was met
- The benefit of the processing and the significance to the organisation
- Description of the possible impact of not processing and any other issues that might be relevant

2. Determine the Necessity of the Processing

Vetiva will establish why the processing must take place, how the processing relates to the expected benefits, and any other alternatives and why there were not considered.

3. Balance the identified interest with the Privacy Interest of the Data Subjects

The following questions will be addressed under the balance test:

- Who are the data subjects (category)?
- What is the relationship between Vetiva and the data subject
- What personal data is to be processed
- How will the processing impact the data subject
- How will the data subject react to the processing

Vetiva records this information in line with this policy, data protection impact assessment, and data inventory.

4. Consent

Vetiva requires the explicit consent of customers, visitors, and other relevant stakeholders (“data subjects”) to process collected personal data. Visitors to Vetiva’s website are expected to read and understand the website privacy notice and then agree to the website’s terms of use; and by consenting to this privacy policy, data subjects are giving us the permission to use/process their personal data specifically for the purpose identified before collection.

If, for any reason, Vetiva is requesting sensitive personal data from data subjects, they will be rightly notified why and how the information will be used.

Where processing relates to a child under 18 years old, as in the case of NDPA or 16 years in the case of GDPR, Vetiva shall demonstrate that consent has been provided by the person who holds parental responsibility over the child.

You may withdraw consent at any time by requesting for Withdrawal of Consent form, following the Vetiva Withdrawal of Consent Procedure.

5. Disclosure

Vetiva will not pass on your personal data to third parties without first obtaining your consent.

Where there is a need for a third party to process the personal data of data subjects, Vetiva will enter into a Data Processing Agreement with the third party and be satisfied that the third party has adequate measures in place to protect the data against accidental or unauthorised access, use, disclosure, loss, or destruction.

6. Retention of Records

In compliance with the GDPR/NDPA data retention policy, Vetiva will process your personal data for the duration of your relationship with us and will retain the personal data for a period of 6 years.

This retention period has been established to enable us use the personal data for the necessary legitimate purposes identified, in full compliance with the legal and regulatory requirements. When we no longer need to use your personal information, we will delete it from our systems and records, and/or take steps to encrypt it to protect your identity.

7. Data Subject Rights

Data subjects, according to the provision of the GDPR/NDPA, have certain rights. At any point while Vetiva is in possession of or processing your personal data, you, the data subject, have the right to:

- Request a copy of the information that we hold about you
- Correct the data that we hold about you that is inaccurate or incomplete
- Ask for the data we hold about you to be erased from our systems/record
- Restrict processing of your personal data where certain conditions apply
- Have the data we hold about you transferred to another organisation
- Object to certain types of processing like direct marketing
- Object to automated processing like profiling, as well as the right to be subject to the legal effects of automated processing or profiling
- Judicial review, in the event that Vetiva refuses your request under rights of access, we will provide you with a reason as to why.

All of the above requests will be forwarded on should there be a third party involved in the processing of your personal data.

8. Complaints

If for any reason a data subject wishes to make a complaint about how Vetiva (or any of Vetiva's third parties) processes their personal data, or how their complaint has been handled, they have the right to lodge a complaint directly with the Data Protection Officer of Vetiva.

Below is the detail for this contact:

	Data Protection Officer (DPO)
Email:	legal@vetiva.com
Telephone:	09139350341