

PRIVACY POLICY

INTRODUCTION

This Privacy Policy (“**Policy**”) and any other document referred to in this Policy sets out how Pace Registrars Limited (“Pace Registrars” “we” or “us”) manages and process your Personal Data including any other information.

Please read the following carefully to understand our views and practices regarding your Personal Data and how we will treat it. If you have any comments on this Policy, please email them to **info@paceregistrars.com**

CONSENT

You accept this Policy and hereby give us consent to save, process and use your Personal Data to the extent as allowed by the Nigeria Data Protection Regulation (NDPR) when we collect your Personal Data.

Personal Data is information that can be directly used to identify you and includes but is not limited to your name, address, telephone number, email address and any other information of like nature.

COLLECTION OF PERSONAL DATA

We will collect and process the following data about you:

1. We collect the content, communication and other information you provide to us or from third parties/partners that we work with. These include when you:
 - 1.1 fill forms, questionnaires or surveys;
 - 1.2 visit our company premises;
 - 1.3 make an enquiry or ask us to provide you with information;
 - 1.4 register, leave any comments or reviews;
 - 1.5 attend any of our promotional events;

2. Information we collect about you.

With regard to each of your visits to our website, office or the use of our services or that of our third parties/partners, we may collect the following information:

technical information, e.g. the Internet Protocol (IP) address used to

- 2.1 connect your computer to the internet.
- 2.2 information about your use of our website, interaction information, record of any correspondence between us and any phone number used to call our customer service number;

3. Information we receive from other sources

This information we receive about you if you use the services of our third parties or partners we operate with or the other services we provide. Typically, such information is used when we act as a data processor or to comply with legal obligation, in our legitimate interests, your legitimate interests or that of our third parties or affiliates.

Pace Registrars ensures that your Personal Data is processed with a legitimate and lawful purpose.

USE OF COOKIES

Cookies allow a web server to transfer data to a computer or device for recordkeeping and other purposes. We use cookies and other technologies to, among other things, better serve you with more tailored information and facilitate your ongoing access to and use of our website. If you do not want information collected through the use of cookies, there is a simple procedure in most browsers that allows you to decline the use of cookies. To learn more about cookies, please visit [<https://www.allaboutcookies.org/>].

HOW WE USE YOUR PERSONAL DATA

1. We use information held about you in the following ways, that is to:

- 1.1 comply with legal obligations to which we are subject to. This include: Guidelines / Frameworks by the Securities and Exchange Commission (SEC) for capital market operators;
 - 1.2 carry out our obligations arising from any contracts entered into between you and us or third parties and to provide you with the information and services that you request from us;
 - 1.3 tailor the content we display to you;
 - 1.4 provide you with information about our services we offer that are similar to those that you have already engaged us or enquired about;
 - 1.5 notify you about changes to our service;
 - 1.6 ensure that content from our service is presented in the most effective manner for you;
 - 1.7 administer our service and for internal operations, including but not limited to data analysis, testing, research, statistical and survey purposes;
 - 1.8 improve our service to ensure that content is presented in the most effective manner for you and for your device;
 - 1.9 help you to participate in interactive features of our service, when you choose to do so;
 - 1.10 measure or understand the effectiveness of advertising we serve to you and others, and to deliver relevant advertising to you; and
 - 1.11 make suggestions and recommendations to you and other users of our services that may interest you or them.
2. We will use information provided by you to provide you, or permit selected third parties to provide you, with information about services we feel may interest you. If you are an existing client/customer, we may contact you by e-mail, sms, post, or call with information about services similar to those, which were the subject of a previous transactions with you. If you are a new customer, and where we permit selected third parties to use your data, we (or they) will contact you. If you do not want us to use your data in this way, or to pass your details on to third parties, you may unsubscribe

from promotional emails via a link provided in each email or reach out to us via info@paceregistrars.com

CHILDREN'S PRIVACY PROTECTION

We encourage children below age of 18 years to use our services only with the assistance and presence of their parents or guardians.

LEGAL BASIS FOR PROCESSING OF PERSONAL DATA

We will only process your Personal Data where we have a legal basis to do so. The legal basis will depend on the purpose for which we have collected and use your Personal Data.

The legal basis for processing is any of the following:

- i. **Consent:** This will apply where you have provided your consent to the processing of your Personal Data for one or more specific purposes;
- ii. **Performance of Contract:** This will apply where processing is necessary for the performance of a contract to which you are a party or in order to take steps prior to entering into a contract with you;
- iii. **Vital interests:** This is where processing is required for the protection of your vital interests.
- iv. **Compliance with legal obligation:** Where we are subject to a legal obligation and need to use your Personal Data in order to comply with that obligation.
- v. **Public interest:** Where processing is necessary for the performance of a task or function carried out in the interest of the public.
- vi. **Legitimate Interest** - means the interest of our business in conducting and managing our business to enable us give you the best services and most secure experience.

PRIVACY BY DESIGN

When designing and implementing a new business or technological process involving the collection or use of Personal Data, we will take into consideration, among its other consideration, the need for structured privacy planning for this process. For example, the

company will consider collecting only the types of information required for the business process in the first place.

SECURITY OF PERSONAL DATA

We adopt robust technologies and security measures to ensure the Personal Data we hold about you is suitably protected. We take steps to protect your information from unauthorized access and against unlawful processing, accidental loss, destruction and damage. Furthermore, we have put in place digital and physical security measures to limit or eliminate possibilities of security breaches.

DISCLOSURE OF YOUR PERSONAL DATA

Pace Registrars only discloses Personal Data with other companies or individuals in the following limited circumstances:

- We may provide such Personal Data to affiliated companies or other trusted businesses or persons for the purpose of processing Personal Data on our behalf. We require that these parties agree to process such Personal Data based on our instructions and in compliance with the Nigeria Data Protection Regulation (NDPR) and any other appropriate confidentiality and security measures. When they no longer need your Personal Data to fulfil this service, they will dispose of the details in line with the NDPR.
- [*With other third-parties such as email service providers that perform marketing services on Pace Registrar's behalf*].
- With other non-affiliated companies for our everyday business purposes, such as to process transactions, maintain accounts, respond to court orders and legal investigations.
- In response to a request for Personal Data, if we are required by, or we believe disclosure is in accordance with, any applicable law, regulation or legal process.

- With relevant law enforcement officials or other third parties, such as investigators or auditors, if we believe it is appropriate.
- In connection with, or during negotiations of, any merger, sale of Pace Registrar's assets, financing or acquisition of all or a portion of our business to another company; and
- With your consent or at your direction, including if we notify you that the Personal Data you provide will be shared in a particular manner and you provide such Personal Data.
- We may also share aggregated or de-identified or anonymized Information, which cannot reasonably be used to identify you.

WHERE WE STORE YOUR PERSONAL DATA

We will hold your Personal Data on [*Client Companies*]'s systems for as long as it is necessary to fulfil the purpose for which it was collected or to comply with legal, regulatory or internal policy requirements.

Your Personal Data will not be retained for longer than is necessary for the purposes for which it was processed unless a longer retention period is required or permitted by law.

YOUR RIGHTS

The law gives you certain rights in respect of the information we hold about you. Below is a highlight of some of those rights, which do not however constitute a complete, exhaustive statement of your rights in respect of your Personal Data:

- i.** You have a right to consent to this Policy and to withdraw your consent at any time.
- ii.** You have a right to a copy of the Personal Data we hold about you, as well as the information about what we do with it, who we share it with and how long we hold it for. We may make a reasonable charge for additional copies of that Personal Data in the case of unfounded and excessive requests.
- iii.** You have a right to freely transfer your Personal Data received from us to any other person.

- iv. You have the right to have the information we hold about you corrected, if it is factually inaccurate. You may contact us for this purpose by sending a mail to **[info@paceregistrars.com]**.
- v. In some circumstances, you have the right to the deletion of the information that we hold about you.
- vi. You have a right to lodge a complaint about the handling of your Personal Data with the National Information Technology Development Agency ("NITDA").
- vii. You have the right to ask us not to process your Personal Data for marketing purposes. We will usually inform you (before collecting your Personal Data) if we intend to use your Personal Data for such purposes or if we intend to disclose your information to any third party for such purposes.
- viii. You have the right to be informed about the existence of automated decision-making processes, including profiling as well as meaningful information about the logic involved, the significance and the envisaged consequences of such processing.

NITDA's website (<https://nitda.gov.ng/nit/>) has a wealth of useful information in respect of your rights over your Personal Data.

If you wish to exercise your rights, you may contact the office of our Data Protection Officer at **[jelili.lawal@paceregistrars.com]**.

BREACH/ PRIVACY VIOLATION

In the event of a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to your Personal Data, Pace Registrar shall within 72 (seventy-two) hours of having knowledge of such breach report the details of the breach to NITDA. Furthermore, we shall inform the Data Subject of the breach incident, the risk to the rights and freedoms of the Data Subject resulting from such breach and any course of action to remedy the said breach.

CHANGES TO OUR PRIVACY POLICY

Any changes we make to this Policy in the future will be posted on this page. Please check back frequently to see any updates or changes to this Policy.

CONTACT

Questions, comments and requests regarding this Privacy Policy are welcomed and should be addressed to **[info@paceregistrars.com]** or our offices at: PACE REGISTRARS LIMITED

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