

## **Our Privacy Policy**

This privacy policy regulates how personal information you provide may be used by Structured Resource Business Limited (**SRBL**), its subsidiaries, affiliates, officers, employees, agents, and duly authorised third parties involved in the SRBL value chain.

### **1. What Data Do We Collect?**

- a. When you use SRBL's website or mobile application ("Platforms") we collect information sent to us by your devices. The automatically collected information includes but is not limited to data about the pages you access, computer IP address, device ID or unique identifier, device type, geo-location information, computer and connection information, mobile network information, statistics on page views, traffic to and from the sites, referral URL, ad data, standard web log data, still and moving images.
- b. We also collect the information you provide us on web forms, survey responses, account update information, email address, phone number, the organisation you represent, corporate information, correspondence with SRBL's support services etc. We may also collect information about your transactions, enquiries and your activities on our Platforms.
- c. We may also use information provided by third parties like social media sites. Information about you provided by other sites is not controlled by SRBL and we are, therefore, not liable for how such third parties use your information.

### **2. How We Use Your Data**

SRBL may obtain, use and retain your personal information for any or all of the following purposes:

- Processing purchases of our products, effecting payments and completing instructions or requests.
- Operational purposes.
- Statistical analysis, conducting market research and surveys for the improvement of our products and services.
- For marketing purposes and promotional events.
- For the prevention, detection, investigation and prosecution of crime in any jurisdiction (including, without limitation, money laundering, terrorism, fraud and other financial crime).
- To comply with the laws of the Federal Republic of Nigeria, regulations, judgments or court orders, any directive of a public authority/regulator/law enforcement agency, internal policies and reporting requirements.
- To seek professional advice, in connection with any processes, claims or proceedings instituted by or against SRBL resulting from any product or service provided to you.

### **3. Your Data Confidentiality Rights**

- a. SRBL undertakes to preserve the highest standards of privacy, security and confidentiality of all information you provide to SRBL. Your personal data will not be disclosed to any third party other than as required by applicable laws, rules and regulations.
- b. You have the right to request sight of and copies of any information we keep on you if such requests are made in compliance with the Freedom of Information Act and other relevant enactments.
- c. While SRBL is responsible for safeguarding the information entrusted to us, you must also adopt appropriate security measures such as the non-sharing of passwords and other platform login details.

#### **4. Your Privacy Rights**

- a. This Privacy Policy describes your privacy rights regarding our collection, use, storage, sharing and protection of your personal information. It applies to SRBL's website and all databases, applications, services, tools and physical contact with us, regardless of how you access them.
- b. If you have created a username, identification code, password or any other piece of information as part of our access security measures, you must treat such information as confidential, and you must not disclose it to any third party.
- c. We reserve the right to disable any user identification code or password, whether chosen by you or allocated by us, at any time, if in our opinion you have failed to comply with any of the provisions of this Privacy Policy.
- d. If you know or suspect that anyone other than you know your security details, you must promptly notify us at [dataprotection@structuredresources.ng](mailto:dataprotection@structuredresources.ng)

#### **Rights of Minors**

We do not collect process personal data belonging to minors if you are under the age of 18, you are not authorised to provide us with personally identifying information, and we will not use any such information in our database collection activities. We appreciate your cooperation with this legally mandated requirement.

#### **5. Links to Other Websites**

- a. Certain transaction processing channels may require links to other websites or organisations other than ours. Please note that SRBL is not responsible and has no control over websites outside its domain. We do not monitor or review the content of other parties' websites which are linked to our website or media platforms.
- b. Opinions expressed or materials appearing on such websites are not shared or endorsed by us, and SRBL should not be regarded as the publisher of such opinions or materials.
- c. Please be aware that we are not responsible for the privacy practices, or content of these sites.
- d. We encourage our users to be aware of when they leave our site and to read the privacy statements of these sites. You should evaluate the security and trustworthiness of any other site connected to this site or accessed through this site yourself, before disclosing any personal information to them
- e. SRBL will not accept any responsibility for any loss or damage in whatever manner, howsoever caused, resulting from your disclosure to third parties of personal information.

#### **6. How We Share your Data**

- a. SRBL works with third parties, service providers, agents and regulators to provide our products and services. In doing so, we may provide such third parties with information for the purpose of assessing your eligibility for our products, such as your email address or mobile phone number, identification etc.
- b. You accept that your pictures and testimonials on all social media platforms about SRBL may be used for limited promotional purposes by us. This does not include your trademark or copyrighted materials.
- c. From time to time we may send you relevant information such as news items, enforcement notices, statutorily mandated notices and essential information to aid the provision of our services. We may also share your personal information in compliance with national or international laws, crime prevention and risk management agencies and service providers.

## **7. Cookies policy**

- a. We use cookies on our website in order to improve user experience. We will assume you agree to accept the cookies that we use on our website if you do not disable or opt out of them as described below.
- b. Cookies are small text files. They are commonly downloaded to your computer or mobile device by websites that you visit. They enable the website to tag your device and recognise it as you move around the site (and potentially when you return later) so that, for example, you do not have to re-enter your password each time you move between pages of the website.
- c. If you do not wish to receive cookies, you can set your web browser to disable cookies. As explained above, cookies help you to get the most out of our website. If you decide to disable cookies, you may find that certain aspects of our website do not work as expected.

## **8. How We Secure Your Information**

- a. We store and process your personal information on our computers in Nigeria. Where we need to transfer your data to another country, such a country must have an adequate data protection law. We will seek your consent when we need to send your data to a country without an adequate data protection law.
- b. We protect your information using physical, technical, and administrative security measures to reduce the risks of loss, misuse, unauthorised access, disclosure and alteration. Some of the safeguards we use are firewalls and data encryption, physical access controls to our data centres, and information access authorisation controls.
- c. We will always hold your information securely. To prevent unauthorised access to your information, we have implemented strong controls and security safeguards at the technical and operational levels. Our website uses Secure Sockets Layer/Transport Layer Security (SSL/TLS) to ensure secure transmission of your Personal Data. You should see the padlock symbol in your URL address bar once you are successfully logged into the platform. The URL address will also start with https:// depicting a secure webpage. SSL applies encryption between two points such as your PC and the connecting server. Any data transmitted during the session will be encrypted before transmission and decrypted at the receiving end. This is to ensure that data cannot be read during transmission.
- d. SRBL has also taken measures to comply with global Information Security Management Systems. We, have, therefore, put in place digital and physical security measures to limit or eliminate possibilities of data privacy breach incidents.
- e. All data breaches will be dealt with in line with SRBL's Breach Policy and reported to the relevant regulators and government authorities within 72 hours of the occurrence of such breaches.

## **9. Governing Law**

This privacy policy is made pursuant to the Nigeria Data Protection Regulation 2019, the Data Protection Act 2023 and other relevant Nigerian laws, regulations or international conventions applicable to Nigeria. Where any provision of this Policy is deemed inconsistent with a law, regulation or convention, such provision shall be subject to the overriding law, regulation or convention.

## **10. Consent**

You accept this privacy policy when you give consent upon access to our Platforms, or use our services, content, features, technologies or functions offered on our website, or mobile application or visit any of



our offices for official or non-official purposes. This privacy policy governs the use of SRBL's Platforms and intervention projects by our users and stakeholders unless otherwise agreed upon through a written contract. We may amend this privacy policy at any time by posting a revised version on our Platforms.