



Privacy Policy

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1. INTRODUCTION

FMDQ Privacy Policy ("**Privacy Policy**") provides information on the collection, use, sharing, storage and processing of personal information by FMDQ Group PLC ("**FMDQ Group**") and its entities (together known as "**FMDQ**", "**we**" or "**us**") when you use FMDQ websites and services, download documents, subscribe for newsletters, interact with FMDQ during in-person meetings, at FMDQ sponsored events, or events hosted at our premises, and in the context of other marketing and branding activities. This Privacy Policy also explains the choices you have regarding these processing activities.

This Privacy Policy is prepared in accordance with the provisions of the Nigeria Data Protection Act ("**NDPA**" or "**the Act**") and in recognition of the European Union General Data Protection Regulation ("**GDPR**"). It may change over time to comply with legal requirements or meet changing business needs. The most up-to-date version can be found on our website. If there is an important change that we want to highlight to you, we will also inform you in another appropriate way, such as via a pop-up notice or statement of changes on our website.

The Policy outlines the types of information we may collect about you, the reasons for collecting it, and how we collect such information. It also highlights who we share the information with, and your rights as a data subject.

2. SCOPE

All data subjects whose personal data is collected in line with the requirements of NDPA/GDPR.

3. PRIVACY POLICY

3.1. Who we are

FMDQ Group is Africa's first vertically integrated financial market infrastructure ("**FMI**") group, strategically positioned to provide registration, listing, quotation and noting services; integrated trading platform, clearing & central counterparty, and settlement services for financial market transactions; depository of securities, as well as data and information services, across the debt capital, foreign exchange, derivatives and equity markets, through its wholly owned subsidiaries – FMDQ Securities Exchange Limited, FMDQ Clear Limited, FMDQ Depository Limited and FMDQ Private Markets Limited. As a sustainability-focused FMI group, FMDQ Group, through FMDQ Securities Exchange Limited, operates Africa's premier Green Exchange – FMDQ Green Exchange – positioned to lead the transition towards a sustainable future.

3.2 Personal Data

Under the NDPA, personal data is any information relating to an individual who can be identified or is identifiable, directly, or indirectly, by referencing an identifier such as a name, an identification number, location data, an online identifier, or one or more factors specific to the physical, physiological, genetic, psychological, economic, cultural or social identity of that individual.

3.3 Who is Responsible for Your Personal Information?

FMDQ is your data controller or processor and is responsible for processing your personal information described in this Privacy Policy. FMDQ uses the personally identifiable information you provide to communicate with you in response to your enquiries, to provide the services you request, and to manage your account. Any personally identifiable information gathered by FMDQ will be used for these purposes only. We will not disclose or divulge such data outside of FMDQ, other than to third-party providers that assist us in providing the services. FMDQ does not share, sell, rent or trade personally identifiable information with third parties for promotional purposes.

3.4 What Personal Information do we Collect?

The types of personal information we process will depend on the service you receive from us. FMDQ uses the personally identifiable information you provide to communicate with you in response to your enquiries, to provide the services you request, and to manage your account. The types of personal information which FMDQ may collect, and process are:

- Name, contact address, email address, and telephone number
- Demographic attributes, when tied to personal information that identifies you
- Employer, corporate contact details, job title
- Transactional data, including financial details, passport photograph
- Career history, professional background, and other CV-related information
- National passport, driver's licence or any other form of proof of identification
- Data from surveys and publicly available information, such as social media posts
- Unique identifications such as your mobile device identifier or cookie ID on your browser
- IP address and information that may be derived from IP address, such as geographic location
- Information about a device you use, such as browser, device type, operating system

FMDQ will only collect information that is necessary for the provision of its service(s) that you have requested. FMDQ may collect and process personal data of children during some of our programmes. Such data is collected and processed only with the consent of the parent or a legal guardian, as applicable, in line with current laws and regulations that govern such data and the rights of the child.

3.5 How we Collect Personal Information?

We collect information about you and any other party whose details you provide to us when you:

- Register to use our websites and portals
- Complete online forms
- Take part in surveys
- Interact with us using our social media platforms
- Download information such as publications or participate in any other interactive areas that appear on our website or portals
- Contact us offline, for example, by phone call, SMS, email, post, or any other means of communication
- Access and use any of our websites or portals from your devices (including mobile devices) and applications
- Share information with third parties that are entitled to share that information, but in each case as permitted by applicable laws

3.6 Why and how do we use Your Personal Information?

All personal information which we collect, and process is justified by lawful processing on the basis that:

- You have given and not withdrawn consent to the processing
- Processing is necessary for the performance of a contract to which you are a party or take steps to enter into a contract
- Processing is necessary for compliance with a legal obligation to which we are subject
- Processing is necessary in order to protect your vital interests or another natural person
- Processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in us
- Processing is for legitimate interests pursued by us or by a third party to whom the data is disclosed

We may use personal information for the following purposes:

- **To communicate and respond to your requests and enquiries about FMDQ** - If you get in touch with us (such as completing the registration form on our website, sending an email or visiting our social media platforms), we process information about you to communicate with you and to respond to your requests or other enquiries. Based on the personally identifiable information you provide us, we may send you a welcoming email to verify your username and password. Also, in response to your enquiries, FMDQ may communicate with you by email or telephone
- **To administer subscriptions to periodic newsletters** – FMDQ may use a third party to create and distribute various newsletters via email. The third party will collect your name

and email address when you click through to their site and sign up for the newsletter. Please review their Privacy Policy to determine how your information will be used

- **To deliver technical and functional management on our sites** - When you choose to register with us (such as the use of our market data), we need to process the personal information provided by you so that we can create and manage a personal account for you. Upon creating your account, we will send you your personal login information. This personal information enables us to administer your account, for example by changing your password for you
- **To market our services or related services, and to tailor our marketing and brand activities to you or your Company's interests** – FMDQ may use your information to notify you via email or telephone about new products and services, updates and associated campaigns and promotions, including through newsletters
- **To provide specific services in accordance with an agreement you are entering or have entered into with us** - If you subscribe to our services (for example, e-Markets Data subscription), you provide services to us, our employees, or as a supplier or business partner, we process information about you to engage in, provide such services, and administer the relevant transactions. For instance, if you register as a Member, we will use the information to onboard you as a Client and to carry out background and screening checks
- **To analyse, develop, improve and optimise the use, function and performance of our sites, products and services** – We may process personal information in order to analyse, develop, improve and optimise the use, function and performance of our sites and products, as well as marketing campaigns. In case the sites permit you to participate in interactive discussions, create a profile, post comments, opportunities, or other content, communicate directly with another user or otherwise engage in networking activities, FMDQ may process personal information when moderating these activities
- **To manage the security of our sites, networks, and systems** – We may collect site usage data for security and operations management to help keep our sites, networks, and systems secure, investigate and prevent potential fraud (including advertisement fraud and cyber-attacks) and detect bots
- **To comply with applicable laws and regulations and to operate our business** - In some cases, we have to process personal information to comply with applicable laws and regulations. For example, to respond to a request from a regulator or to defend a legal claim. We may also process personal information in the performance and operation of

our business, such as conducting internal audits and investigations or for finance and accounting, archiving and insurance purposes

- **To arrange events hosted at our premises** – Whether you are an organiser or an attendee, we use personal information to arrange events and to control access to our premises

3.7 Data Analytics

We may use data analytics tools to analyse the information generated and stored during your use of our services to improve our services, provide content tailored to your personal preferences, and monitor our website's traffic and usage. Other purposes include:

- Develop and provide new and existing functionality and services
- Determine your general location to evaluate how our known clients engage with different parts of our website

All these tools may be provided by third-party service providers and may include the collection and tracking of certain data and information regarding the characteristics and activities of visitors to our website. We may disclose data, including personal information, to such third-party services providers to obtain such services. You have the right to object to processing based on our legitimate activities, but if you object, this may affect our ability to provide certain services and/or solutions for your benefit.

3.8 Who we Share Your Personal Data With

Your personal data may be stored in a database we can access in order to provide you with our services. We may also share your data with third parties (data processors) who provide us with data storage facilities. In accordance with this Privacy Policy, other categories of third parties with whom we may share your information include:

- Service providers (e.g., IT services) or third parties which process information on our behalf (e.g., internet service and platform providers, payment processing providers and organisations we engage to help us send communications to you) to assist in providing you with the applications, services, and information you have requested or which we believe is of interest to you
- Analytics and search engine providers that assist us in the improvement and optimisation of our website
- Law enforcement or regulatory agencies, or authorised third parties, in response to a verified request relating to a criminal investigation, alleged illegal activity, or any other activity that may expose us, the user, or any third party to legal risks or liability

- Third parties where you have a relationship with that third party, and you have consented to us sending information (e.g., social media sites or other third-party application providers)
- National Data Protection Commission (“NDPC”) professional advisors and auditors for the purpose of seeking professional advice or to meet our audit responsibilities
- Agencies where reporting is mandatory under applicable laws

We may share non-personally identifiable information (e.g., the pages you visit, which links you click, which advertisements you see and click on, and the categories of search terms you enter) about the use of our website or portal publicly or with third parties but this will not include information that can be used to identify you.

3.9 Retaining Your Personal Information

FMDQ will retain your personal data in line with legal and regulatory requirements or use it where we need to for our legitimate purposes such as managing your account and dealing with any disputes or concerns that may arise. We may need to retain information for a longer period where we need the information to comply with regulatory or legal requirements or where we may need it for our legitimate purposes (e.g., to help us respond to queries or complaints, fighting fraud and financial crime, responding to requests from regulators etc.). When we no longer need to use your personal information, we will remove it from our systems and records and/or take steps to encrypt it so that you can no longer be identified.

3.10 How Is Your Personal Information Secured?

The security of your personal information is important to us. FMDQ, therefore, takes reasonable precautions to protect your personal information. We follow accepted industry standards to protect the personal information submitted to us, both during transmission and after receiving it. FMDQ has implemented appropriate technical, physical and organisational measures designed to protect personal information against accidental or unlawful destruction, accidental loss, damage, alteration, unauthorised disclosure or access, and all other forms of unlawful processing.

3.11 Your Rights as a Data Subject

At any point, while we are in possession of or processing your personal data, you, the data subject, have the following rights:

- **Right of access** – You have the right to confirm whether we are storing or otherwise processing your personal data and request a copy of the information we hold about you

- **Right of rectification** – You have a right to correct data that we hold about you that is inaccurate or incomplete
- **Right to be forgotten** – In certain circumstances, you can ask for the data we hold about you to be erased from our records
- **Right to restriction of processing** – Where certain conditions apply, you have a right to restrict the processing
- **Right of portability** – You have the right to have the data we hold about you transferred to another organisation
- **Right to object** – You have the right to object to certain types of processing, such as direct marketing
- **Right to object to automated processing, including profiling** – You also have the right not to be subject to the legal effects of decisions based solely on automated processing or profiling
- **Right to judicial review** - If FMDQ refuses your request under rights of access, we will provide you with a reason for the refusal
- **Right to complaint** – You have the right to lodge a complaint with the NDPC

3.12 Can I Find out the Personal Data that FMDQ Holds About me?

At your request, you can confirm what information FMDQ holds about you and how it is processed. If FMDQ does hold personal data about you, you can request the following information:

- Contact details of the Data Protection Officer, where applicable
- The purpose of the processing as well as the legal basis for processing
- If the processing is based on the legitimate interests of FMDQ or a third party, information about those interests
- The categories of personal data collected, stored and processed
- Recipient(s) or categories of recipients that the data is/will be disclosed to
- Concerning personal data transfers, when necessary, we may need to transfer your personal data to third parties or service providers in other countries for the purposes described in this Privacy Notice. These transfers may include the processing of your personal data in countries that may not have the same level of data protection laws as we do in Nigeria. However, we will take all necessary steps to ensure that your personal data is adequately protected and that any of such transfers comply with applicable data protection laws. We will implement appropriate safeguards, such as using standard contractual clauses approved by NDPC or other relevant data protection authorities, and any other permissible clauses according to the NDPA that applies, to protect your data during international transfers.
- How long the data will be stored
- Details of your rights to correct, erase, restrict or object to such processing
- Information about your right to withdraw consent at any time

- How to lodge a complaint with the Supervisory Authority (NDPC)
- Whether the provision of personal data is a statutory or contractual requirement, or a requirement necessary to enter into a contract, as well as whether you are obliged to provide the personal data and the possible consequences of failing to provide such data
- The source of personal data if it was not collected directly from you
- Any details and information of automated decision-making, such as profiling, and any meaningful information about the logic involved, as well as the significance and expected consequences of such processing

3.13 What Forms of Identification will I Need to Provide in Order to Access This?

FMDQ accepts the following forms of identification (but not limited to) when information on your personal data is requested:

- Passport
- Driver's Licence
- National Identity Card
- Permanent Voters Card

3.14 Dispute Resolution or Filing a Complaint

If you have any complaints regarding our compliance with this Privacy Policy, please contact our Data Protection Officer. We will investigate and attempt to resolve complaints and disputes regarding the use and disclosure of personal information within thirty (30) days in accordance with this Privacy Policy and in accordance with applicable law and regulation.

3.15 Changes in this Privacy Policy

Changes to this Privacy Policy will be made in accordance with current data privacy laws and regulations. You will always be able to find the most recent version of our updated Privacy Policy on FMDQ's website.

3.16 Compliance with the Regulators

This Private Policy is in line with the provisions of the Act. The Act describes how organisations, including FMDQ, must collect, handle and store personal information and applies regardless of whether data is stored electronically, on paper or on other materials.

3.17 Contact us

If you have any questions or suggestions or complaints about how we (or any of our third parties) have handled or handles your personal data, please contact our Data Protection Officer.

Contact details:

Email: privacypolicy@fmdqgroup.com

Telephone: +234 20 1 7008555