

AVA GLOBAL ASSET MANAGERS LIMITED PRIVACY POLICY

Ava Global Asset Managers Limited (“we” or “us” or “our” or “AVA GAM”) is a portfolio management and investment firm that offers advisory services as well as non-traditional asset management services through privately managed portfolios and collective investment schemes (the “Services”) in Nigeria. We are committed to protecting the privacy of our users (“your” or “you”) online and in real time. This Privacy Policy describes your privacy rights regarding our collection, use, storage, sharing, and protection of your personal information, including but not limited to your personal identifiers, electronic network activity information, professional information, location information, and other types of information described below and on our website at <https://avacapitalgroup.com/> (the “Website”).

AVA GAM uses the following methods to collect and securely store your personal information:

- Website
- Online forms
- Cookies
- Physical forms
- Know Your Customer (KYC) documents
- Oral/written/electronic communication with employees and agents affiliated with AVA GAM
- Information available in the public domain made public by you, the press, or public search engines
- Information provided by third parties such as family, friends, employers, and solicitors
- CCTV recordings at our various offices

1. WHAT DATA WE COLLECT

- 1.1 Personal data or personal information refers to information about an individual from which such person can be identified. Such data include your first name, last name, username or similar identifier, title, date of birth, and gender, including residential address, email address, and telephone number(s).
- 1.2 Financial data, including but not limited to records of your account transactions, including payment records received from third-party payment gateways or credit agencies.
- 1.3 Human resources data, which includes information relating to your employment history, as well as the professional and educational details you provided when applying for employment with us.

AVA Global Asset Managers (RC 1210383)

Address: 3, Glover Road, Ikoyi, Lagos. Tel: +234 0700 0000 AVA Website: www.avacapitalgroup.com

Chairman: Dr. Adeyinka Adedeji Ag. Managing Director: Kunle Odebiyi Directors: Kayode Fadahunsi, Taiwo Okunmolu,

Samson Adekunle



- 1.4 Technical data, which includes internet protocol (IP) address, domain name, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access this Website.

2. HOW WE USE PERSONAL DATA

2.1 Our lawful basis for utilising personal information

We will only use and process your personal data as permitted by the Nigerian Data Protection Act 2023 and any applicable implementation Framework issued by the Nigeria Data Protection Commission.

When you use our Services, particularly on our Website, your geographic location, how you use the Services, information about the type of device you use, your Open Device Identification Number, date/time stamps for your visit, your unique device identifier, your browser type, operating system, Internet Protocol (IP) address, and domain name are all collected.

In general, the personal information you submit to us is used to respond to requests made, assist us in serving you better, or market our Services. We use your personal information in the following ways:

- a. To help us deliver the most relevant information to you, administer and improve the Website;
- b. To maintain and improve the performance of the Services;
- c. To process your transactions and keep you informed about the status of your business relationship with us;
- d. To deliver investor-related services;
- e. To communicate with you and administer our services and events, including sending promotional materials, newsletters, and other marketing communications;
- f. To offer customer support and assistance;
- g. To comply with regulatory provisions;
- h. To verify your identity and safeguard against fraud and other unlawful activities, unauthorised transactions, claims, or liabilities;
- i. To update and enhance our records;
- j. To link or combine user information with other personal information we get from third parties, to help understand your needs and provide you with better service;
- k. To develop, improve, and deliver marketing and advertising for the Services;
- l. To provide and deliver products and services you request;
- m. To identify you as a user in our system.

We may also create anonymous data records from your personal information by completely excluding information (such as your name) that makes the data personally identifiable to you. We use this anonymous data to analyse requests and usage patterns so that we may enhance the content of our Services and improve Website functionality. We reserve the right to use anonymous data for any purpose and disclose anonymous data to third parties at our sole discretion.



We may receive testimonials and comments from users who have had positive experiences with our Services, and publish such content. When we publish this content, we may identify our users by their first and last names. We obtain the user's consent before posting this set of information along with the testimonial.

3. COOKIES

Our Website uses cookies to distinguish you from other users of our Website. This helps us to provide you with a good experience when you browse our Website, and also allows us to improve our Website. "Cookies" are small pieces of information (text files) that a website sends to your computer's hard drive while you are viewing the Website.

These text files can be used by the Website to make the user's experience more efficient. The law states that we can store these cookies on your device if they are strictly necessary for the operation of this Website.

For all other types of cookies, we need your permission. To that end, this Website uses different types of cookies. Some cookies are placed by third-party services that appear on our pages.

We, and some third parties, may use both session Cookies (which expire once you close your web browser) and persistent Cookies (which stay on your computer until you delete them) to provide you with a personal and interactive experience on our Services and to market the Services or other products. Marketing cookies are used to track visitors across Websites.

The intention is to display ads that are relevant and engaging for the individual user and thereby more valuable for publishers and third-party advertisers. This tracking is done on an anonymous basis.

4. DISCLOSURE OF YOUR PERSONAL INFORMATION

We disclose your personal information as described below and as described elsewhere in this Privacy Policy:

- a. Third Parties Designated by You – When you use the Services, the personal information you provide will be shared with the third parties that you authorise to receive such information.
- b. Third Party Service Providers – We may share your personal information with third-party service providers to: provide you with the Services that we offer you through our Services; conduct quality assurance testing; provide technical support; market the Services; and/or to provide other services to us, External Auditors, other subsidiaries or entities of AVA GAM, and Legal and Regulatory authorities.

5. INFORMATION WE SHARE

We may disclose aggregated information about our users and information that does not identify any individual without restriction. In addition, we may disclose personal information that we collect or you provide:



- a. To fulfill the purpose for which you provide it, for any other purpose disclosed by us when you provide the information, or with your consent;
- b. To third parties designated by you;
- c. To our subsidiaries and affiliates;
- d. To contractors, service providers, and other third parties we use to support our business;
- e. To a buyer or other successor in the event of a merger, divestiture, restructuring, reorganisation, dissolution, or other sale or transfer of some or all of our assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which personal information held by us about users is among the assets transferred.

6. OTHER DISCLOSURES

Regardless of any choices you make regarding your Personal information (as described below), we may disclose your Personal information if we believe in good faith that such disclosure is necessary:

- a. in connection with any legal investigation;
- b. to comply with relevant laws or to respond to subpoenas or warrants served on the us;
- c. to protect or defend our rights or property or users of the Services; and/or
- d. to investigate or assist in preventing any violation or potential violation of the law, this Privacy Policy, or our Terms of Use.

7. THIRD PARTY WEBSITES

Our Website may contain links to third-party websites. When you click on a link to any other website or location, you will leave our Website and go to another Website, and another entity may collect personal information or anonymous data from you. We have no control over, do not review, and are not responsible for these third-party websites or their content. Please be aware that the terms of this Privacy Policy do not apply to these third-party websites or content, or to any collection of your personal information after you click on links to such third-party websites. We encourage you to read the privacy policies of every website you visit. The links to third-party websites or locations are for your convenience and do not signify our endorsement of such third parties or their products, content, or websites.

8. DATA RETENTION

Your personal data will be retained only for as long as is necessary to fulfill the purposes outlined in this Privacy Policy. We may retain and use your data as required to:

- a. Comply with applicable legal and regulatory obligations (e.g., statutory data retention requirements)
- b. Resolve disputes
- c. Enforce our legal agreements and policies
- d. Fulfill our contractual obligations with you
- e. Beyond these purposes, your data will only be retained in accordance with applicable regulatory requirements.



9. DATA STORAGE AND TRANSFER

All personal information you provide is stored on secure servers, protected physical locations, and cloud infrastructure (where applicable). Whenever such transfers occur, we will implement appropriate safeguards to ensure that your information is handled securely and in compliance with this Privacy Notice.

10. YOUR CHOICES REGARDING INFORMATION

10.1 Choices

We offer you choices regarding the collection, use, and sharing of your personal information. We may periodically send you emails that directly promote the use of our Services. When you receive promotional communications from us, you may indicate a preference to stop receiving further communications from us, and you will have the opportunity to “opt out” by following the unsubscribe instructions provided in the email you receive or by contacting us directly. Despite your indicated email preferences, we may send you service-related communications, including notices of any updates to our Terms of Use or Privacy Policy.

10.2 Cookies

If you decide at any time that you no longer wish to accept cookies from our Services for any of the purposes described above, then you can instruct your browser, by changing its settings, to stop accepting cookies or to prompt you before accepting a cookie from the websites you visit. Consult your browser’s technical information. If you do not accept cookies, however, you may not be able to use all portions of the Services or all functionality of the Services. If you have any questions about how to disable or modify cookies, please contact us at info@avacapitalgroup.com.

11. SECURITY

The security of your Personal Information is important to us, but remember that no method of transmission over the Internet, or method of electronic or physical storage, is 100% secure. While we strive to use commercially acceptable means to protect your Personal Information, we cannot guarantee its absolute security.

12. MINORS

Our Services are not directed to children under the age of 18. If a child under 18 submits personal information to us and we learn that this is the case, we will take steps to remove the personal information from our databases. If you believe that we might have any personal information from a child under 18, please contact us at info@avacapitalgroup.com.

13. YOUR RIGHTS

As a user of this Website, you have the following rights, any of which you may exercise by contacting us:



- a. The right to ask what personal data we hold about you at any time. Extra requests (particularly repetitive) for data may result in a fee being charged to the user.
- b. The right to ask us to update and correct any out-of-date or incorrect personal data that we hold about you free of charge.
- c. As set out above, the right to opt out of any marketing communications that we may send you.
- d. To request that we delete your personal data, for example, if we no longer have a valid reason to process it.
- e. To object to how we process your personal data.
- f. To restrict how your personal data is processed in certain cases, such as when the accuracy of your Personal data is contested.

14. CONSENT

We will provide you with our Privacy Policy whenever we are collecting your personal information, irrespective of the medium used. For the electronic medium, your consent is obtained by asking you to click on a button to show acknowledgment of the Policy. On the other hand, for your personal information collected via a paper document, we will require you to sign off on the document showing your understanding of our Privacy Policy.

15. CHANGES TO THIS PRIVACY POLICY

This Privacy Policy is effective and will remain in effect except with respect to any changes in its provisions in the future, which will be in effect immediately after being posted on this page. We reserve the right to update or change our Privacy Policy at any time, and you should check this Privacy Policy periodically. Your continued use of the Service after we post any modifications to the Privacy Policy on this page will constitute your acknowledgment of the modifications and your consent to abide by and be bound by the modified Privacy Policy. If we make any material changes to this Privacy Policy, we will notify you either through the email address you have provided us or by placing a prominent notice on our Website.