



Guaranty Trust Pension Managers

GUARANTY TRUST PENSION MANAGERS LIMITED

Data Privacy Policy

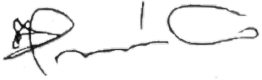

Title	Guaranty Trust Pension Managers Limited Data Privacy Policy		
Author	Head, Compliance (DPO)		
Date Version Created	December 20, 2022		
Reviewers	Title	Signature	Date
Prepared by	Head, Compliance		December 20, 2022
Approved by	Managing Director		January 19, 2023
	Board Chairman	Approved	January 20, 2023
Summary	This policy establishes Guaranty Trust Pension Managers Limited's Data Protection Policy		
Reference	NDPR 2019; EU GDPR (2016/679); Capital Market Operators AML/CFT Regulations, 2022; Central Bank of Nigeria AML/CFT/CPF Regulations 2022, Section 35 & 36		
Classification	Internal		
Version	1.0		

Table of Contents

Statement	4
Purpose	4
Changes to This Policy	4
Information That We Collect	4
Purpose of Processing Personal Information	5
Parties We Share Personal Data With	5
Social media platforms	6
Security of the Data in Our Possession	6
Retention Period of the Data in Our Possession	6
Trans-Border Flow of Personal Data	6
Privacy of Children	7
Review	7
Contact Us	7

Statement

The Guaranty Trust Group (Guaranty Trust Holding Company Plc and all its subsidiaries) is a leading African financial services institution whose mission is to make end-to-end financial services easily accessible to every African, and businesses by leveraging technology and strategic partnerships. In the Guaranty Trust Group, we treat personal information as private and confidential. This privacy policy should be read alongside the terms and conditions attached to the various Group members' products and services and is addressed to people and entities with whom the Group members interact.

Purpose

This policy applies to **Guaranty Trust Pension Managers Limited** as well as all subsidiary companies under Guaranty Trust Holding Company Plc (collectively referred to as "we", "us", "our"). The purpose of this policy is to provide information about the manner in which we collect, store, protect, process and share the personal information of customers, suppliers, business partners and visitors to our premises and websites in our role as a data controller.

Changes to This Policy

From time to time, this privacy policy may be updated to reflect changes in applicable law or internal changes in our data collection, processing and sharing activities. The approval date of the policy will determine which version will be considered in the event a request or complaint involving this policy is received.

The latest version will be available on our website and changes posted using pop-up notices on any of our digital channels.

Every party interacting with us automatically acknowledge that they are aware and agree with the content of this privacy policy and understand that it might be modified from time to time.

Information That We Collect

We collect personal information through various channels and the information collected depends on the product or service a client holds or the nature of the relationship/engagement with us. Data may also be collected by us through other sources such as credit bureaus, employers etc.

The personal information we collect, generate and use includes but is not limited to the categories listed below.

Personal Data Collected	Examples
1. Personal details	Name, gender, biometric information, details of education, employment details, next of kin etc.
2. Contact details	Phone number, email address, physical address
3. User login and subscription data	Login details/ authentication details to our online and physical channels etc.
4. Identity-related information	National Identification Number (NIN), international passport, bank verification number (BVN), IP address, data related to the use of our websites, cookies etc.
5. Financial details	Financial transaction data, transaction network, instructions given (electronic and physical format), bank accounts' details, details of assets, portfolio value, etc.

6. Other information	Any other information provided to us during our interactions, whether in person, or by any communication means, any information obtained in relation to security, fraud management, investigations, risk management, health and safety, AML/CFT/CPF, KYC requirements, regulatory requirements/obligations etc
7. Personal data of third parties	Information listed under (1) to (6) above relating to the data subject's relationship network i.e. next of kin, dependents, referees, advisors etc.

Purpose of Processing Personal Information

We may process personal information, on an appropriate legal basis, for the following purposes:

- Onboard new clients
- Conduct Anti-Money Laundering/Combating the Financing of Terrorism/Proliferation Financing (AML/CFT/CPF) checks
- Carry out/attend to clients' requests/service issues
- Provide products, on-premises and online services
- Process applications for products and services
- Recover money that the data subject owes us
- Conduct investigations
- Assess credit worthiness
- Monitor and manage risk
- Assess employment suitability
- Data analytics
- IT systems and infrastructure related processing
- Transfer to archive
- Correspond with third party professionals

- Ensure the security of our physical and digital assets as well as our employees
- Manage human resources
- Conduct market/product research as well as customer satisfaction surveys
- Enable corporate communication internally and externally
- Provide and display marketing information, promotional messages via various digital and physical channels of communication
- Comply with our regulatory and legal obligations
- Any other purpose related to/compatible with the purposes listed above

Parties We Share Personal Data With

In some circumstances and where lawful to do so, we may share the data subject's information with third parties, which in turn process this information in accordance with their respective privacy policies and local regulations.

Who we may share with	Examples
1. Other subsidiaries of Guaranty Trust Holding Company	Internal operational purposes, cross-selling/up-selling of products and services, etc.
2. Advertising partners	Social media platforms, marketing agencies etc.
3. Third party service providers (<i>this includes their sub-contractors and affiliates</i>)	Debt collectors, credit reference bureaus, data aggregators (e.g., for visa applications), payment service providers (e.g., card schemes), market researchers etc
4. Third party plug-in providers	Our websites and other channels might use third party plug-ins/content and personal data will be shared with these if

	accessed by the data subject.
5. Government, regulators, legal authorities/bodies, law enforcement agencies, rating agencies and similar authorities	Securities & Exchange Commission, Court of Law etc.
6. Third party acquirer	Data will be shared in the event of a sale or transfer of part of our assets or our businesses or a restructuring of our businesses.
7. Professional Advisers to the Guaranty Trust Holding Company Plc and its subsidiaries	Auditors, lawyers, financial advisers, tax consultants, and other professional advisers
8. Other third parties	Other parties relevant to prevent, detect, investigate, combat criminal activities and inadequate conduct etc. -Data subject's legal representative upon death or mental incapacity

Social media platforms

We may interact with registered users of various social media platforms, including Facebook, Twitter, Google+, LinkedIn, TikTok, Instagram etc. Any content posted on social media platforms (e.g. pictures, information or opinions) as well as any personal information that is made available to users is subject to the applicable social media platform's terms of use and privacy policies. We recommend that social media platform users review this information carefully in order to better understand their rights and obligations with regard to such content.

Security of the Data in Our Possession

We take reasonable technical and organizational security measures to protect data subjects' personal information. Processes are also in place to control and restrict personal data access on a need-to-access basis. We also require external service providers to adhere to appropriate security standards.

It is the responsibility of the data subject to ensure that they transmit data to us securely and keep any password and other authentication devices/details confidential.

Retention Period of the Data in Our Possession

Personal data is retained in accordance with our data retention policy. We abide by the minimum regulatory requirements and extant laws in our operating environment. We keep this data:

- For as long as there is an ongoing business relationship with the data subject
- For as long as required to fulfil our legal, regulatory, tax and other business obligations
- In most cases for a period of at least 5 years after the end of a relationship

At the end of the retention period, we may archive, permanently delete, or anonymize this personal information.

Trans-Border Flow of Personal Data

Personal information collected may be processed in other countries. Countries may have different level of data protection. We will abide by the applicable laws and regulations in the host location and may also request for the service provider in the host

country to commit to practices similar to the ones described in this document.

Rights of the Data Subject

During the retention period of their personal information, data subjects are entitled to the rights listed below, subject to applicable laws and regulations:

- **Access**
A data subject has the right to request and access the personal information we possess about him/her.
- **Objection**
Data subjects have the right to object to our processing of their data; in addition, they can ask us to limit the processing of their information to specific activities. In certain circumstances where we have legitimate reasons to do so, such requests will be denied. Requests should be made to the Data Protection Officer whose contact details are provided in the 'Contact Us' section.
- **Correction**
Data subjects have the right to request that any inaccurate or incomplete information we hold about them is updated/corrected.
- **Deletion**
A data subject has the right to ask us to delete their personal information.
- **Complaint**
A data subject has the right to complain about our processing of his/her information to the relevant data protection regulator in his/her country of residence.

The rights of data subjects listed above will not apply in instances where processing is required:

- For dispute resolution
- To comply with laws and regulations
- So as not to infringe on our rights and the rights of others

Privacy of Children

We respect the privacy of children and only open accounts and process their personal information with the consent of their legal representative. We do not knowingly collect names, email addresses or any other personally identifiable information from children. Personal information collected for minors will only be processed in accordance to the above section on "*Purposes of processing personal information*".

Review

This policy shall be reviewed every three (3) years to reflect current realities and such reviews must be presented for adoption and approval by the Board.

Contact Us

Any complaints, questions, or requests regarding the processing of personal information should be directed to the relationship managers, the customer service representatives at any of our locations or to our Data Protection Officer.

Our Data Protection Officer (DPO) can be contacted at the following email address: DPO@gtpensionmanagers.com