

INTRODUCTION

INTERSTATE SECURITIES LIMITED (ISL) Privacy Policy provides information on the collection, use, sharing and processing of personal information by ISL and its third parties when you use ISL websites and services, download documents from us, subscribe for newsletters, interact with ISL during in-person meetings, at ISL 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 in relation to these processing activities.

This Privacy Policy was written on December, 2019. However, the Privacy Policy may change over time, due to the need to comply with legal requirements or meet changing business needs. The most up-to-date version can be found on this website. In case there is an important change that we want to highlight to you, we will also inform you in another appropriate way (for example via a pop-up notice or statement of changes on our website).

In this Privacy Policy, 'personal information' or 'personal data' means information that relates to an identified individual or to an identifiable individual. This could include among other things your name, address, email address, business contact details, or information gathered through your interactions with us via our websites or at events. Personal information is also referred to as 'information about you.'

PRIVACY POLICY

Who we are?

ISL was incorporated in 1984 by the Founder and Pioneer Chairman, Late Chief (Dr.) Samuel Oyewole Asabia and commenced business as a dealing member of the Nigerian Stock Exchange in March 1985. The Company is registered with the Securities & Exchange Commission as a Broker/Dealer and an Issuing House.

ISL engages in services such as Corporate Finance, Brokerage Service and Advisory Service.

Personal Data

Under the Nigeria Data Protection Regulation (NDPR), personal data is defined as: "any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person".

Who Is Responsible For Your Personal Information

ISL is your data controller and is responsible for processing your personal information described in this Privacy Policy. ISL uses the personal 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 personal identifiable information gathered by ISL will be used for these purposes only. We will not disclose or divulge such data outside of ISL, other than to third party providers that assist us in providing the services. ISL does not share, sell, rent or trade personal identifiable information with third parties for their promotional purposes.

What Personal Information Do We Collect

The types of personal information that we process will depend on the service you receive from us. ISL, 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 ISL, may collect and process are:

- ■ Name, contact address, email addresses, and telephone numbers
- ■ Demographic attributes, when tied to personal information that identifies you
- ■ Employer, corporate contact details, job title
- ■ Transactional data, including financial details, your photograph
- ■ Professional background and other CV related information
- ■ National passport, driving license or any other form of proof of identification
- ■ Data from surveys and publicly available information, such as social media posts
- ■ 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
- ■ The Group will only collect information that is necessary for the provision of its service(s) that you have requested

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 telephone, 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

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 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
- We may use personal information for the following purposes:

- ■ **To communicate and respond to your requests and enquiries about ISL** – If you get in touch with us (such as by completing the registration form on our website, sending an email or by visiting the social media platforms), we process information about you to communicate with you and to respond to your requests or other enquiries. Based upon 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, ISL may communicate with you by email or telephone.

- **■ To administer subscriptions of periodic newsletters** – The Company may use a third party to create and distribute various newsletters via e-mail. The third party will collect your name and e-mail 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 to make 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** – ISL may use information about you to notify you (email or telephone) about new products and services, updates and associated campaigns and promotions (including via 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 instance, e-Markets subscription), you provide services to us, our employees, or as a supplier or business partner, and we process information about you to engage in, provide such services, and administer the relevant transactions.
- **■ To analyze, develop, improve and optimize the use, function and performance of our sites and products and services** – We may process personal information in order to analyze, develop, improve and optimize 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, or communicate directly with another user or otherwise engage in networking activities, ISL may process personal information when moderating these activities.
- **■ To manage the security of our sites, networks and systems** – We may collect site use data for security and operations management to help keep our sites, networks and systems secure, or to investigate and prevent potential fraud, including ad fraud and cyber-attacks and to 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 to conduct internal audits and investigations or for finance and accounting, archiving and insurance purposes.
- **■ To arrange events hosted at our premises** – whether you are either an organizer or an attendee and to control access to our premises.

DATA ANALYTICS

We may use data analytics tools to analyze the information generated and stored during your use of our services to improve our services, provide content tailored to your personal preferences, and to monitor our website's traffic and usage. The 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 in order 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.

Who We Share Your Personal Data With

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

- **■ Service providers** (for example, IT services) or third parties which process information on our behalf (e.g. internet service and platform providers, payment processing providers and those organizations we engage to help us send communications to you) so that they may help us to provide you with the applications, services, and information you have requested or which we believe is of interest to you.

We may share non-personally identifiable information (e.g. the pages you visit, and which links you click, which ads 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.

Retention of Your Personal Information

ISL will retain your personal data in line with its Retention Policy, that is, personal data will only be retained for 10 (ten) years after a client has closed his/her account. This enables us to comply 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.

How is Your Personal Information Secured?

The security of your personal information is important to us. ISL therefore takes reasonable precautions to protect your personal information. We generally follow accepted industry standards to protect the personal information submitted to us, both during transmission and once we receive it. No method of transmission over the Internet, or method of electronic storage, is 100% secure. However, ISL has implemented appropriate technical, physical and organizational measures designed to protect personal information against accidental or unlawful destruction, accidental loss, damage, alteration, unauthorized disclosure or access, as well as all other forms of unlawful processing.

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 request a copy of the information that 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 to 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 organization
- **■ 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 to be subject to the legal effects of automated processing or profiling
- **■ Right to judicial review** – in the event that **Interstate Securities** refuses your request under rights of access, we will provide you with a reason for the refusal

Can I Find Out The Personal Data That Interstate Securities Holds about Me?

ISL at your request can confirm what information we hold about you and how it is processed. If ISL 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 ISL 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**
- **■ If we intend to transfer the personal data to a third party or international organization, information about how we ensure this is done securely. The Attorney General of the Federation will approve sending personal data to some countries because they meet a minimum standard of data protection. In other cases, we will ensure there are specific measures in place to secure your information**
- **■ 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 (NITDA)**
- **■ 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**

What Forms of ID Will I Need To Provide In Order To Access This

We accept the following forms of ID (but not limited to) when information on your personal data is requested:

- International Passport
- Driver License
- National Identity Card
- Permanent Voter Card

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 use and disclosure of personal information within thirty (30) days in accordance with this Privacy Policy and in accordance with applicable law and regulation.

Changes in This Privacy Policy

If we decide to change our Privacy Policy, we will post those changes to this privacy statement, the homepage, and other places we deem appropriate so that you are aware of what information we collect, how we use it, and under what circumstances, if any, we disclose it. We reserve the right to modify this Privacy Policy at any time, so please review it frequently. If we make material changes to this Policy, we will notify you here or by means of a notice on our homepage.

Compliance with the Regulators

This Private Policy is in line with the provisions of Nigeria Data Protection Regulation, 2019 (Regulation). This Regulation describes how organizations including ISL must collect, handle and store personal information and applies regardless of whether data is stored electronically, on paper or on other materials.

Contact Us

If you have any questions or suggestions regarding our privacy policy, please contact our Data Protection Officer.

Contact Details of the Data Protection Officer:

Contact Name: Ambrose Udeaba

Email: info@interstatesecurities.com, ambrose.udeaba@interstatesecurities.com

Telephone: +234 127 0724

Cookie Policy

About Cookies

Cookies are a kind of short-term memory for the web. They are stored in your browser and enable a site to 'remember' little bits of information between pages or visits. Cookies can be used by web servers to identify and track users as they navigate different pages on a website, and to identify users returning to a website. Cookies may be either "persistent" cookies or "session" cookies. A persistent cookie consists of a text file sent by a web server to a web browser, which will be stored by the browser and will remain valid until its set expiry date (unless deleted by the user before the expiry date). A session cookie, on the other hand, will expire at the end of the user session, when the web browser is closed.

Cookies on Our Website

We use both **session cookies** (which expire once you close your web browser) and **persistent cookies** (which stay on your device until you delete them). We have also grouped our cookies into the following categories, to make it easier for you to understand why we need them:

- **Functionality:** these cookies enable technical performance of our websites and allow us to 'remember' the choices you make and your preferences
- **Performance/Analytical:** these cookies allow us to collect certain information about how you navigate the Sites. They help us to understand which parts of our websites are interesting to you and which are not as well as what we can do to improve them.

How We Use Cookies

Cookies do not contain any information that personally identifies you, but personal information that we store about you may be linked, by us, to the information stored in and obtained from cookies. The cookies used on this website include those which are strictly necessary cookies for access and navigation, cookies that track usage (performance cookies) and remember your choices (functionality cookies). We may use the information we obtain from your use of our cookies for the following purposes:

- ■ To recognize your computer when you visit our website
- ■ To retain clients' email addresses and passwords when they log in to our 'Member's Area'
- ■ To track you as you navigate our website
- ■ To improve the website's usability
- ■ To analyze the use of our website – such as how many people visit us each day
- ■ In the administration of our website

Third-Party Cookies

In some special cases we also use cookies provided by trusted third parties. The following section details which third party cookies you might encounter through this site.

■ This site uses Google Analytics which is one of the most widespread and trusted analytics solutions on the web for helping us to understand how you use the site and ways that we can improve your experience. These cookies may track things such as how long you spend on the site and the pages that you visit so we can continue to produce engaging content. For more information on Google Analytics cookies, see the official Google Analytics page.

- ■ We also use social media buttons and/or plug-in on this site that allow you to connect with your social network in various ways. For these to work the following social media sites

including Twitter, LinkedIn, will set cookies through our site which may be used to enhance your profile on their site or contribute to the data they hold for various purposes outlined in their respective privacy policies.

Disabling Cookies

You can prevent the setting of cookies by adjusting the settings on your browser (see your browser Help for how to do this). Be aware that disabling cookies will affect the functionality of this and many other websites that you visit. Disabling cookies will usually result in also disabling certain functionality and features of this site. Therefore, it is recommended that you do not disable cookies.

More Information

Please do not hesitate to get in touch with us using the contact details on our [contact page](#) if you have any questions or queries regarding how we use cookies or anything else on our website.