

DATA PRIVACY POLICY

This Privacy Policy informs you of the data we collect, why we collect it and what we do with it after collection. The controls available to you to manage your data is also available within this policy.

Leadway Asset Management Company Limited (LAM) is committed to ensuring that the privacy and personal information of its clients, employees, vendors and other stakeholders (data subjects) are protected. LAM is the entity that collects and processes your personal information and the responsibility is not outsourced to any third party. LAM is also responsible for complying with extant Nigerian and applicable international laws on data protection. For the purpose of this Privacy Policy, references to LAM or the Company shall mean Leadway Asset Management Company Limited.

By providing the data subject's personal information or the personal information of a beneficiary, the data subject acknowledges that LAM may only use the information in the manner specified in this Privacy Policy.

There may be a need to update this policy periodically, for example as a result of government regulations, new technologies or other developments on data protection and / or privacy laws. The current version of this policy is available on our website (<https://www.leadwayassetmanagement.com>) and LAM's web and/or mobile app

ROLE DEFINITIONS:

The following roles are defined for the purpose of this policy:

Data Subject: is an identifiable person; one who can be identified directly or indirectly, in particular by reference to an identification number or to one or more factors specific to his physical, physiological, mental, economic, cultural or social identity and includes LAM's clients, customers, business partners and employees.

Data Administrator: means a persons or organization that processes data. For the purpose of this policy, Leadway Asset Management Company Limited is the Data Administrator.

Data Controller: means a person who either alone, jointly with other persons or in common with other persons or as a statutory body determines the purposes for and the manner in which personal data is processed or is to be processed. For the purpose of this policy, the Chief Executive Officer/Managing Director is the Data Controller or whoever he so delegates.

Data Protection Officer: is appointed by the data controller to ensure that the strategy and implementation of data protection requirements are in compliance with the data protection policy and the relevant extant laws. For the purpose of this policy, the data protection officer is defined as the Group Chief Compliance Officer of Leadway.

Responsibilities of the Data Administrator, Data Controller and Data Protection Officer are clearly outlined in the Nigeria Data Protection Act (2023).

1. Introduction

When LAM collects and processes the personal information of its data subjects, LAM ensures it adheres to strict controls to ensure that personal data of the data subject is obtained and used in line with the company's privacy principles. LAM handles personal data with the greatest care and uses it only for legitimate and specified business purposes under the following principles:

1. LAM respects the privacy rights of its employees, customers, clients, business partners and other individuals whose personal data are in its custody and use.

2. LAM protects personal data by implementing appropriate technical and organizational measures in its data processing operations.
3. LAM obtains personal data fairly and only uses it for legitimate business purposes.
4. LAM holds itself accountable for demonstrating compliance with applicable legal and regulatory requirements and understanding of its roles and responsibilities.

All personal information collected by LAM is processed in accordance with the extant data protection laws in Nigeria.

2. Type of Information Processed by Leadway Asset Management Company Limited

The precise nature of the personal data LAM processes depends on data subject's relationship with LAM. However, in many cases, if the Company is handling the data subject's personal data as part of its role as a fund/portfolio Manager, the Company may process the following:

- 2.1. Information about the data subject – for example name, age, gender, date of birth, nationality. Even though in some instances LAM do not receive your name, the Company needs enough information to identify the data subject and his/her investment profile so that the Company can provide services to its clients.
- 2.2. Means of identification - date of birth, National Identity Card Number (NIN), International Passport details, Drivers' License, Voter's card details, Bank Verification Number (BVN), etc.
- 2.3. Contact information – in some cases, for example, the Company may receive the data subject's email address, address, and phone number.
- 2.4. Online information – for example cookies and IP address (your computer's internet address), if you use LAM's websites.
- 2.5. Financial information – the Company may process information related to payments the data subject make or receive in the context of an investment portfolio. This includes information such as Bank Verification Number (BVN) and account number.
- 2.6. Contractual information – for example details about the investment portfolios a data subject holds and with whom the data subject holds them.
- 2.7. Other sensitive personal data (background information, Marital status, criminal history record, Biometric details, Gender and/or any other sensitive personal information required to perform LAM's contractual obligation to the data subject).

3. Requirement for Consent

- 3.1. LAM shall obtain the consent of data subjects to use/process their personal information in order to perform its contractual obligations to the data subject. Without such consent, LAM may be unable to provide the required services to the data subject. Where the data subject provides personal information about third parties, LAM will ask such persons to confirm that the third party has given consent to the data subject to act on their behalf and will provide LAM with a copy of the consent issued.
- 3.2. Consent will be obtained via the same medium used to obtain personal information or through any

other means that is acceptable to LAM. Reference will be made to this Policy or a summarized version that can be easily understood by the data subject. The data subject will be required to indicate understanding and acceptance of the terms contained in the policy. This can be via signature for physical documents or a ticked checkbox for electronic platforms.

- 3.3. Where LAM has appropriate, legitimate business need to use client personal information for maintenance of business records including development and improvement of products and services, LAM will take extra care to ensure that the data subject's rights to security and confidentiality is not infringed upon.

4. Reasons for use and process of data by LAM

- 4.1. LAM will obtain the consent of the data subject before use and processing of the data for one or more specific purposes made known to the data subject.
- 4.2. Such personal data obtained with the consent of the data subject shall not be used in any manner other than the stated purpose for which the data was obtained, except with further consent of the data subject whether at the instance of the data subject or upon LAM's engagement with the data subject.
- 4.3. LAM may use data subject's personal data for a number of reasons:
- 4.3.1. To provide, maintain and improve our Services
 - 4.3.2. To provide and deliver the products and services you request, process transactions and send you related information, including confirmations.
 - 4.3.3. To verify your identity and prevent fraud.
 - 4.3.4. Assessing, improving and developing our services
 - 4.3.5. Enhancing our knowledge of risk and investment markets in general
 - 4.3.6. Fulfilling legal or regulatory obligations and protecting ourselves and our clients against fraud. Such regulators include Securities and Exchange Commission, Nigerian Financial Intelligence Unit and such other regulatory agencies that is created from time to time.
 - 4.3.7. For the protection of public interest such as investigation of fraudulent claims and anti-money laundering checks.
 - 4.3.8. For archiving purposes in the public interest, scientific or historical research purposes or statistical purposes.
 - 4.3.9. For the purpose of assessment of proposed data subject's employability and other employee benefits-related purposes.
 - 4.3.10. Send technical notices, updates, security alerts and support and administrative messages.
 - 4.3.11. Respond to comments, questions and requests and provide customer service.
 - 4.3.12. Communicate with data subjects about products, services, offers, promotions, rewards, and events offered by LAM and its associate companies, and provide news and information of interest and importance to the data subject.
 - 4.3.13. Monitor and analyse trends, usage and activities in connection with our Services.
 - 4.3.14. Personalize and improve the Services and provide advertisements, content or features that match user profiles or interests.
 - 4.3.15. Link or combine with information we get from others to help understand the needs of the data subject and provide them with better service.
 - 4.3.16. Carry out any other purpose for which the information was collected.
 - 4.3.17. LAM is based in Nigeria and the information it collects is governed by the Nigerian law. By accessing or using the Services or otherwise providing information to us, the data subject consents to the processing and transfer of information in and to Nigeria and other countries.
- 4.4. LAM applies information protection technologies including perimeter security, malware

management, data loss prevention and backup & recovery. LAM's data centers are also protected against environmental threats. LAM's information security policies and practices apply to all personal information in the company's custody.

- 4.5. LAM will only transfer personal information to a third party where the Company has ensured that such information is protected and the data subject's consent has been obtained. LAM will procure the privacy policy of the Third Party to guarantee the safeguard and protection of the personal data of the data subject in the custody of the third party. No consent shall be sought, given or accepted in any circumstance that may engender direct or indirect propagation of atrocities, hate, child rights violation, criminal acts and anti-social conducts.

5. Methods of collecting private information

- 5.1. In most cases, LAM receives personal data from third parties such as its corporate clients and may also receive personal data directly from the data subject.

- 5.2. The following shall comprise the method of collection of personal information:

5.2.1. Direct collection:

- 5.2.1.1. Know Your Customer (KYC) forms
- 5.2.1.2. Account Opening forms
- 5.2.1.3. Recorded telephone conversations
- 5.2.1.4. Digital touch points
- 5.2.1.5. Electronics means (emails and apps)
- 5.2.1.6. Service Agreements/Contracts
- 5.2.1.7. Employee data collection forms

5.2.2. Third parties data collection source:

- 5.2.2.1. Non-affiliated third-party service providers/reference agencies in order to verify your identity and for fraud prevention, including your prior addresses and names.
- 5.2.2.2. Associate Companies.
- 5.2.2.3. Individuals or Organisations with investment accounts with LAM under which the data subject is named as a Next of Kin, beneficiary, signatory, affiliate or any other capacity.

Provided that in the case of data obtained from third party source, a copy of the data subject's consent given to the third party to transfer the data to LAM shall suffice for the Company's use and processing.

6. LAM's Use of Cookies

- 6.1. LAM's websites use cookies to track browsing history of visitors to improve their experience. All Leadway websites provide visitors an option to accept the use of cookies during the browsing session. Consent must be received before any form of data processing can be performed. Every consent given by a data subject will be kept secured as evidence that consent was received.

- 6.2. In the case of LAM's customers, the data subject will provide consent by responding to a dialogue box corresponding to declarations indicating whether consent is given or declined.

Such declaration will be in clear and plain language. For children's personal data, consent will be sought from their legal guardian.

7. Social Media Platforms

7.1. The data subject may wish to participate in various blogs, forums, and other social media platforms hosted by LAM ("Social Media Platforms") which are made available to the data subject. The main aim of these Social Media Platforms is to facilitate and allow the data subject share content. However, LAM cannot be held responsible if the data subject shares personal information on Social Media Platforms that is subsequently used, misused or otherwise appropriated by another user. The data subject is required to consult the Privacy Statements of such services before using them.

8. Third Party Access and Purpose of Access

8.1. Disclosure to Employees

8.1.1. LAM's employees have access to and process personal data based upon a "need to know" basis in order to do their job. LAM regularly checks who has access to its systems and data.

8.2. Disclosures to Third Parties

- 8.2.1. LAM will usually not share the personal data of its data subjects with other third parties without your consent, LAM may however disclose data subjects' personal data to these categories of third parties:
- 8.2.1.1. Service providers and agents e.g. IT companies who support LAM's technology, marketing agencies, research specialists, document management providers and tax advisers.
 - 8.2.1.2. LAM's professional advisers: auditors and legal advisers.
 - 8.2.1.3. Persons legally authorized to act on behalf of LAM e.g. Lawyer, Investment Broker and loss adjusters, etc.
 - 8.2.1.4. Individuals nominated and authorized by the data subject to engage LAM on his/her behalf.
 - 8.2.1.5. Fraud detection agencies and other parties who maintain fraud detection registers.
 - 8.2.1.6. Customer relationship management.
 - 8.2.1.7. Independent Customer satisfaction survey providers.
 - 8.2.1.8. Regulators and other relevant Government agencies.
 - 8.2.1.9. Selected third parties in connection with the sale, transfer or disposal of the business or in connection with employee assessment, academic records verification and employee well-being survey.
 - 8.2.1.10. Associate/affiliated companies within the group.
 - 8.2.1.11. With financial service providers, including the financial institutions identified as the data subject's bank that provide banking services in connection with their investment account or their contractual obligation.
 - 8.2.1.12. With another user, when a data subject sign's up for LAM's services via a referral link. The user that referred the data subject may receive information indicating that the data subject has enrolled with LAM. A data subject may avoid this sharing by not using a referral link to enrol.

- 8.2.1.13. With non-financial companies, such as email service providers that perform marketing services on behalf of LAM, and fraud prevention service providers that use the information to provide services to LAM and other companies.
- 8.2.1.14. With other non-affiliated companies for the Company's everyday business purposes, such as to process transactions, maintain accounts, respond to court orders and legal investigations or report to credit bureaus. For example, in connection with its everyday business purposes, LAM may share information about a data subject as follows:
 - a. In response to a request for information, if LAM is required by, or it believes disclosure is in accordance with, any applicable law, regulation or legal process.
 - b. With relevant law enforcement officials or other third parties, such as investigators or auditors, if it believes it is appropriate to investigate fraud.
 - c. If LAM believes a data subject's actions are inconsistent with the spirit or language of its user agreements or policies, or to protect the rights, property and safety of LAM and/or its stakeholders.
 - d. With a data subject's consent or at his/her direction, including if the data subject is notified that the information provided will be shared in a particular manner.
- 8.2.1.15. LAM may also share aggregated or de-identified Information, which cannot reasonably be used to identify you. For example, it may share transaction zip codes with third parties to improve our accuracy in geo-locating transactions and to improve the clarity of transaction descriptions.

The above disclosures to the third party shall be made only to the extent necessary for the specific purpose for which the data is provided and the third party shall be informed of the confidential nature of such information and shall be directed to keep the data subject's information strictly confidential.

9. Lawful Processing of Personal Data

LAM only processes personal data for legitimate business purposes and on a legal grounds as set out in data protection laws.

9.1.1 There are a number of legal grounds that may apply and the following ones are most likely to be relevant to the data subjects of LAM:

- 9.1.1.1. LAM may process the personal data of the data subject when its obtains consent from the data subject or its agent or any other third party obtains the consent of the data subject.
- 9.1.1.2. Where the data subject has a contract with LAM, the personal data of the data subject may be processed when it is necessary in order to enter into or perform such contract.
- 9.1.1.3. Where LAM has a legal obligation to perform such processing, such as where LAM shares information with its regulators, law enforcement agencies or court.
- 9.1.1.4. In order to protect the vital interests of the data subject or of another natural person.
- 9.1.1.5. In order to process sensitive personal data of the data subject when it is necessary to do so in connection with an investment product.
- 9.1.1.6. Where LAM is required to do so by law or regulatory bodies such as where a court order exists to such effect or there is a statutory obligation to do so.
- 9.1.1.7. Where it is necessary to facilitate prevention and/or detection investigation of

criminal action (including fraud) or is otherwise in the overriding public interest.

9.1.1.8. Where exemptions under the Data Privacy law allows LAM to disclose such information.

9.1.1.9. Where processing is necessary for the performance of a task carried out in the public interest or in the exercise of public mandate vested in Leadway.

The following table contain breakdown of lawful grounds which LAM relies on for processing personal information of its clients:

#	Purpose for collection and processing of data subject's personal information	Collectable Personal information includes but not limited to the ones set out below	Legal grounds for processing personal information
1.	To review an investment proposal and provide a quote in respect of the proposal.	Name, contact details, occupation/net worth, beneficiaries (if any), investment appetite, financial history/record, etc. Information on nature of business and assets. Sensitive personal information such as BVN, criminal record. Any other information relevant to the request.	The use described is necessary for provision of investment advice/products applicable to the data subject.
2	To provide and manage investment portfolios/products. To evaluate eligibility for certain investment/asset classes.	Name, contact details, age, occupation/net worth, beneficiaries (if any), investment appetite/profile, financial history/record etc.) Information on nature of business and assets. Sensitive personal information such as BVN, criminal record. Any other information relevant to the request.	The use described is necessary for provision of investment advice/products applicable to the data subject.
3	For data subject's communication and resolution of complaints.	Contact details and any information relevant to the investment.	The use described is required to provide the investment products and to resolve any legitimate concerns. Where sensitive personal information is requested, it may be necessary for the exercise and defense of LAM's legal rights, where the data subject has provided consent or where we have applied and obtained exemption for investment purposes.
4	To evaluate investment applications and data subject's ability to take certain investment risks and subscribe to investment products.	Contact details, bank account details, financial records/history, investment appetite.	Necessary to provide investment advice/products.

#	Purpose for collection and processing of data subject's personal information	Collectable Personal information includes but not limited to the ones set out below	Legal grounds for processing personal information
5	To prevent, detect and investigate fraud. This may include collection of biometric information such as voice prints.	<p>Contact details, age, details of beneficiaries (if any), details of signatories to the account (where there are multiple), details of ultimate beneficial owners (in case of a corporate entity)</p> <p>Information on occupation/nature of business and assets.</p> <p>Information available in the public domain such as social media.</p> <p>Sensitive personal information such as biometrics (i.e. voice print).</p>	<p>Necessary to provide investment products and a legitimate business need to prevent fraud.</p> <p>Where sensitive personal information is requested, it may be necessary for the exercise and defense of LAM's legal rights, where the data subject has provided consent or where we have applied and exemption for investment purposes.</p>
6	For the purpose of recovering debt.	Contact details, bank account details, collateral information.	<p>Where there is a legitimate business need for debt recovery.</p> <p>Where sensitive personal information is requested, the use described is necessary for establishing, exercising or defending the legal rights of the Company.</p>
7	For the purpose of our own information systems management including; management of business processes such as maintaining financial and accounting records, analysis of financial results, internal and external audit requirements, receiving professional advice (e.g. tax or legal advice). We develop policies and security systems to ensure security and effective operation of our systems.	Information about the data subject including name, residential/office address, email address, telephone number, age.	<p>LAM has a legitimate business need to use its client's personal information to understand its business, monitor performance and maintain appropriate records.</p> <p>Where sensitive personal information is provided, the information is used to determine if an exemption should be applied for Investment purposes.</p>
8	For research and analytical purposes and to improve our products and services.	<p>Contact details, age, age of other persons included on the investment account/contract (e.g. beneficiaries, employees, signatories, ultimate beneficial owners, etc.)</p> <p>Information about nature of business and assets.</p> <p>Sensitive personal information such as health records.</p>	<p>Research and data analytics are conducted for service improvement purposes in the interest of the data subject.</p> <p>Where sensitive personal information is provided, LAM may apply an exemption for investment purposes where appropriate.</p>

#	Purpose for collection and processing of data subject's personal information	Collectable Personal information includes but not limited to the ones set out below	Legal grounds for processing personal information
9	Compliance with legal and/or regulatory obligations	Details about the data subject, other related parties, specific product required by the data subject, service or benefit, depending on the nature of the obligation.	Necessary for LAM to comply with Legal and Regulatory obligations.
10	Providing improved quality, training and security (for example, with respect to recorded or monitored phone calls to our contact numbers); technology may include voice analytics	Details about our clients and other related parties, product or service having been discussed with the client or representative during a telephone conversation with LAM.	The use described is required for Legal and Regulatory compliance.
11	Providing marketing information to LAM clients including information about other products and services and undertaking customer surveys in accordance with preferences communicated by the data subject.	Name, contact details and marketing preference.	Data subject's consent.
12	Determination of employability, background check up, academic records verification, and employee surveys and other HR processes requiring personal identifiers.	Name, contact details, academic records, health background/ information, Marital status, criminal history record, Biometric details, Academic records, and Gender	To determine employability and to improve employee wellbeing, investment contracts and regulatory demands.

10. Foreign Transfer of Personal Data

- 10.1. The transfer of client's personal information may be to a third party in a foreign country which has adequate data protection laws for data transfer, to be determined by the Attorney General of the Federation and the Data subject shall have the right to be informed of the appropriate safeguards for data protection in the foreign country.
- 10.2. Where the Attorney General of the Federation has not determined the third party country, the data subject's personal information may be transferred to a third party in a foreign country in the following circumstances:
 - 10.2.1. Where the data subject has consented to the proposed transfer after having been informed of the possible risks of such transfers.
 - 10.2.2. The transfer is for the performance of a contract between the data subject and the data controller.
 - 10.2.3. The transfer is for the performance of a contract concluded in the interest of the data subject between the Data Controller and another natural or legal person.
 - 10.2.4. The transfer is for public interest.
 - 10.2.5. The transfer is for the establishment exercise or defence of legal claim.
 - 10.2.6. The transfer is to protect the vital interest of the data subject or other persons, where the data

subject is physically or legally incapable of giving consent.

The data subject shall have the right to be informed of the appropriate safeguards for data protection in the foreign country.

11. Length of time for keeping client personal information

The length of time for storing the personal information of a data subject shall be in line with Leadway Group's Data Retention Schedule in its Retention policy. This includes keeping the data subject's information for a reasonable period of time as stated in the Retention policy after the data subject's relationship with LAM or its client has ended and particularly for statistical analysis, pricing and risk modelling purposes.

In certain instances, LAM will minimize personal data; or de-identify data for use in statistical or analytical activities. This is undertaken in accordance with the data protection laws.

12. Data Subject's Rights

- 12.1. LAM shall disclose the specific purpose for which the information is required before obtaining the information from the data subject and shall inform the data subject of his/her right and method of withdrawal of consent.
- 12.2. The data subject has the right to request that LAM perform certain activities on his/her personal information, such as request for a copy of their personal information, correction of errors on the personal information, a change in the use of their personal information, or delete their personal information. LAM is obligated to either carry out the data subject's instructions or explain why it may not be possible - usually because of a legal or regulatory issue.
- 12.3. Data subject have the following rights in respect of LAM's use of their personal information:
 - 12.3.1. **Right to access:** The data subject has a right to a copy of their personal information as maintained by the Company.
 - 12.3.2. **Right to rectify:** LAM takes due care to ensure that the personal information it maintains about data subjects are accurate and complete. However, if a data subject believes the information is inaccurate or incomplete, such data subject has the right to request an amendment.
 - 12.3.3. **Right to erase:** under certain circumstances, a data subject may ask that LAM erase their personal information. For instance, where the personal information collected is no longer necessary for the original purpose or where consent is withdrawn. However, this will need to be balanced against other factors, such as the type of personal information obtained, the original reason for collection, archiving purposes in the public interest, scientific or historical research purposes or statistical purposes, and LAM's continuous assessment of risks relating to the data subject. There may be some legal and regulatory obligations which prevents LAM from complying immediately.
 - 12.3.4. **Right to restriction of processing:** under certain circumstances, but subject to regulatory requirements, a data subject may be entitled to instruct LAM to stop using his/her personal

information. This is applicable where

- a. A data subject contests the accuracy of personal information held by the LAM.
 - b. Processing of personal data of the data subject is unlawful.
 - c. LAM no longer requires the personal data but the data is required by the data subject for establishment, exercise or defense of legal claims.
 - d. The data subject has objected to processing, pending the verification whether the legal grounds for the data controller override those of the data subject.
- 12.3.5. **Right to data portability:** under certain circumstances, data subjects have the right to ask that LAM transfers any personal information that they have provided to LAM to another third party. Once transferred, the other party will be responsible for safeguarding such personal information.
- 12.3.6. **Right to object to marketing:** Data Subjects can object to the processing of his/her personal data for the purposes of third party marketing.
- 12.3.7. **Right to lodge a complaint:** Data subjects have the right to lodge complaints, in the event that there is an objection to the manner in which personal information is being used by the Company. Such complaints can be communicated using contact details provided in our policy documentation. In certain cases, LAM may be unable to comply with data subject's requests for reasons such as its own obligations to comply with other legal or regulatory requirements. However, LAM will always respond to complaints and where compliance is not feasible, an explanation will be provided.
- 12.4. LAM shall communicate any rectification or erasure of personal data or restriction to each recipient to whom the personal data has been disclosed, unless this proves impossible or involves disproportionate effort.
- 12.5. In some circumstances, exercising some of these rights will mean LAM is unable to continue providing service under the data subject's investment product or contract and may therefore result in cancellation of the contract/investment. The data subject will therefore lose the right to bring any claim or receive any benefit under the contract/investment, including in relation to any event that occurred before the right was exercised, if LAM's ability to handle the claim has been prejudiced. Each data subject's account terms and conditions set out what will occur in the event of a account/investment cancellation.
- 12.6. Some of LAM's assessment of client's risk profile are made automatically by inputting the data subject's personal information into a system, the criteria of which is determined by LAM's team and the decision is then calculated using certain automatic processes rather than manual process via discussions. We make automated decisions in the following situations:
- 12.6.1. **Fraud and money laundering prevention:** LAM uses automated anti-fraud and money laundering filters that check against global databases individuals known to have undertaken fraudulent and/or money laundering transactions and will reject those applicants based on outcomes of the automated checks.

- 12.7. Application assessment: LAM may use scoring methods to assess applications and perform identity verification. Examples of information used by LAM systems to do this include age, address, place of work. If a data subject does not consent to processing sensitive information in this manner, LAM may be unable to assess the application. Alternatively, LAM may only be able to offer the data subject investment products that do not require LAM to have that information from the onset.
- 12.8. Where the data subject chooses to opt out of automatic decision-making, a formal communication to that effect will suffice. However, in some situations, it may imply that LAM will be unable to offer a product because decisions are necessary to ascertain eligibility for investment products.

Data subjects can enforce the above rights by sending an email to dpo@leadway.com. The Data Controller is obligated to act on the request of the data subject without delay. In the event that the Data Controller does not take action on the request of the Data Subject, the Data Controller shall within one month of receipt of the request, inform the data subject of the reasons why the request has not been actioned.

The exercise of the rights listed above shall be in conformity with constitutionally guaranteed principles of Law for the general protection and enforcement of fundamental rights.

13. Training

- 13.1. Ultimately, it is the Company's employees who are the most important element of LAM's commitment. LAM's employees are involved in every step of the data lifecycle, including sourcing and receiving personal data, processing it in compliance with laws and regulations, employing safeguards, and establishing the means and schedules of retention and deletion. It is therefore imperative that LAM employees understand their role and be committed to safeguarding personal data.
- 13.2. LAM designs its training programme to be relevant, focused on the individual and also focused on concrete risks. Leadway Group runs regular data protection and information security awareness campaigns. The Company also shares with its employees other knowledge resources on data protection and privacy topics, including guidance on ways that they can better protect and safeguard personal privacy.
- 13.3. It is important that the Company's employees understand the seriousness of protecting personal data and respecting privacy rights with the ability to relate this back to the risks and consequences from an individual perspective. Through LAM's efforts, it remains committed to realize its goal to ensure its employees and business partners understand their respective roles and responsibilities for data protection compliance.

14. Marketing

- 14.1. The data subject reserves the right to the use of his/her personal information for marketing and LAM shall obtain the consent of the client prior to using such information for marketing purpose in specific cases not covered under this policy.
- 14.2. LAM shall be committed to only send its data subjects investment marketing communications

that meets the needs and behaviours of the data subject. Where the data subject chooses to unsubscribe from our mailing lists, such can be achieved at any time by following the unsubscribe instructions that appear in all marketing emails or contact LAM via the details set out in this policy documents.

14.3. Periodically, LAM may run specific marketing campaigns through social media and digital advertising that the data subject may see which are based on general demographics and interests. Individual personal information is not used for these campaigns. Should a data subject not want to see such campaigns, the data subject shall be responsible for adjusting preference settings within the specific social media platform including cookie browser settings

14.4. LAM may retain any data provided on its website and mobile app for a reasonable period, subject to the client's prior approval, even if the contract is not consummated and such information may be used to make enquiry on why the contract is not consummated.

15. Audit and Enforcement of the Data Protection Policy

15.1. The Internal Audit Department of the Company shall conduct the audit of the privacy and data protection practice, in accordance with the extant Data protection regulation and the Data Protection Officer shall be responsible for monitoring compliance with the regulation.

16. Remedies for Violation of Data Protection Policy and the Timeframe for Remedy

16.1. In the event of violation of this policy, the data controller shall within 15 days redress the violation. Where the violation pertains to the disclosure of the data subject's information without his/her consent, such information shall be retracted immediately and confirmation of the retraction sent to the data subject within 48 hours of the redress.

Where the violation is caused by any representative of the data controller, such representative shall be subject to appropriate sanction.

17. Contact details of the Data Controller and Data Protection Officer

Leadway's Data Controller and Data Protection Officer can be contacted via the following details:

Delineate a data controller from a data processor.

Leadway Asset Management Company

1 Alfred Rewane Road, Ikoyi,

Lagos.

dpo@leadway.com and copy assetmanager@leadway.com