

# First Pension Custodian Nigeria Limited Privacy Policy

## Your Privacy First

At First Pension Custodian Nigeria Limited (FPCNL), we put you first and thus committed to protecting and respecting your privacy. We are committed to being transparent about how we collect, process, share and manage data about you (our customers and other natural persons where applicable).

### 1. FPCNL and You

This Privacy Policy stipulates FPCNL's approach to handling your data and your rights with regards to our collection, use, storage and sharing of your personal data which may be collected by FPCNL in the course of providing you with exceptional products and services, collectively referred to herein as FPCNL's "services", across all our delivery channels to meet your needs.

### 2. Your Personal Information

In the course of consuming services provided to you by FPCNL to meet your needs, through this and other channels available, we collect information you provide us via correspondence by mail or emails, service point interfaces, as well as other channel enablers as might be available. The information we collect may include but not limited to: Retirement Saving Account Identification Number (RSAPIN), Names, Pension Remittances, Benefit Payments, instructions and transactions relating to the services.

We may also use information about you collected by third parties and other service partners to provide better serve your needs. Third party sources are not controlled by FPCNL and as such are not liable for how they use it.

### 3. Consent

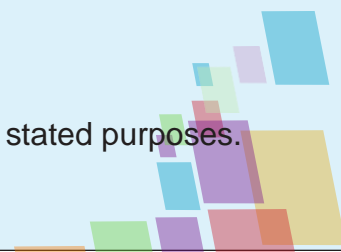
We don't ask for your personal information unless we need it to provide or improve our products and services for you. We want to be sure we have your consent to collect, use and, where necessary, share your information with our partners that help us serve you.

### 4. Use of Your Information

FPCNL will process your personal information for the following purposes; · To offer and provide our Products and Services tailored to meet your unique needs

- To improve your service experience with us
- To conduct our business
- To manage our relationship with you
- To comply with Laws and Regulations
- To provide information to Pension Fund Administrators
- To update your records
- To develop statistics as may be required
- To comply with our Internal Policies
- To communicate with you when necessary

FPCNL will limit the collection and use of your personal information for the stated purposes.



## **5. Cookies**

Please note that for our digital channels, we may collect information about your computer (or mobile device), including where available or necessary your IP address(es), operating system and browser type for system administration. This is statistical data about our users' browsing actions and patterns and does not identify any individual. Further details can be found in our Cookie's policy

## **6. Information sharing and Disclosure**

FPCNL will not sell or rent your personally identifiable information to anyone. FPCNL may share or disclose your personal information to third parties where:

- i. We have your consent to share or disclose such personal information;
- ii. We are required by law to share or disclose such personal information
- iii. We respond to subpoenas, court orders or other legal processes;
- v. Required for audit purposes

## **7. Information Protection and Retention**

FPCNL will always ensure that your personal information is adequately protected. We have put in place processes and technologies to ensure that your personal information is not modified, lost, damaged or destroyed. Our people are trained to ensure that your personal information is not disclosed and safe as stated in this policy.

Where access and use of our electronic platforms requires authentication of the user, you shall be responsible for the use and safety of your authentication credential(s) including but not limited to User Name, Personal Identification Number (PIN) and Password.

We will retain your personal information for such length of time as may be required by law, regulation, the internal policies of FPCNL.

## **8. Remedies**

Where you have concerns relating to the processing of your personal information by FPCNL, or require any clarification on this policy, please notify us through or contact details provided below: Email: [enquiries@firstpensioncustodian.com](mailto:enquiries@firstpensioncustodian.com). We will respond to your concerns within 2 days of receiving your notice.

## **UPDATES TO THIS PRIVACY POLICY**

We may update this policy from time to time. Where there are changes in the way we use your personal information we will notify you by posting a prominent notice on our website.

