

## ONLINE PRIVACY NOTICE

This Privacy Notice applies to personal information EtiquaFinans Limited, House 19 "A" Close, 63 Road, Gwarimpa, FCT, Nigeria, collects through this website [www.etiquafinans.com](http://www.etiquafinans.com) and our mobile apps. Below are highlights of our personal information handling practices. Click here [*add the hyperlink of the full Privacy Notice*] for our detailed Privacy Notice.

### Privacy Notice Highlights

**1. Information We Collect.** We collect your information from the following sources:

- (a) information you give us when you fill out forms, such as during online purchases, customer service inquiries and surveys;
- (b) information from other sources, such as affiliates of our company with which you have purchased goods and services and companies that help us to update our records; and
- (c) information that we collect automatically when you visit our website, such as information about your browser settings and other information collected through cookies.

**2. Why We Collect and Use Your Information**

- (a) We use your information to provide products and services and to manage our business operations. For example, we use your information in order to fill your orders, answer your inquiries, authenticate you when you sign into online services, prevent loss and fraud, and analyse our business operations and website performance.
- (b) We use your information for marketing and promotional purposes, including with our promotional partners.
- (c) We combine all the information we collect other than information relating to your browsing history in order to understand your interests better and to analyse customer trends.

**3. When We Share Your Information**

- (a) We share information with our affiliates. These affiliates may combine the information we provide with other information that they have collected from you.
- (b) We use third parties to assist us in our operations, including our direct advertising and marketing services. We may also share your information with these third parties in order to provide services to you such as shipping.

**4. Your Choices**

(a) When you shop online with us or one of our affiliates and you create an account, we will create an account profile for you. We will use this account profile to select certain goods for you to view during your online experience. This means that you will see a highly customised inventory. If you would prefer not to have a customised experience, you may use our "guest checkout" option instead of creating an account. Your experience on our website will still be customised based on your browsing history, but we will not use your purchase history to customise the inventory we show you.

(b) The Preference Centre allows you to change your communication preferences with respect to email newsletters and notifications of special offers and products.

(c) You may also close your account if you want to withdraw your consent from our further use of your information. We may, however, retain information about your previous transactions for audit purposes, to ensure the integrity of our data and to fulfil legal requirements.

**5. How to Contact Us.** If you have a privacy question or concern, please contact us at: [info@etiqafinans.com](mailto:info@etiqafinans.com)

## **Detailed Privacy Notice**

**1. About Us.** This website [www.etiqafinans.com](http://www.etiqafinans.com) is operated by EtiqaFinans Limited. We are located at House 19 "A" Close, 63 Road, Gwarimpa, FCT, Nigeria.

We have appointed a Chief Privacy Officer who is accountable for our personal information handling practices. If you have any question or complaint about our personal information handling practices, please contact us at [info@etiqafinans.com](mailto:info@etiqafinans.com).

In this Privacy Notice, the terms "we", "our" and "us" mean EtiqaFinans Limited.

**2. Effective Date and Scope.** This Privacy Notice is effective as of 10 April 2022.

This Privacy Notice governs our practices with respect to personal information we collect through the following website and mobile application: [www.etiqafinans.com](http://www.etiqafinans.com).

Our retailers are independently owned and operated. They are required to have a comprehensive privacy notice that is available at their respective stores. You can also view a copy of a retailer's store privacy notice by visiting its website.

**3. What Personal Information Do We Collect?** Personal information is information that identifies you or could be combined by us or our service providers and affiliates with other information to identify you. This information includes your personal email address, your home address, your home telephone number, your personal cell phone number, your image, and may include your age, your income and other similar information when associated with you. Personal information may also be information containing details as to whether you have opened our promotional emails or how you have used our website, if we can associate that personal information with you. If you are a business customer or prospective business

customer, personal information does not include your title, business address and business telephone number when we use that information to contact you in your business capacity.

We collect personal information from you when you create an account, make a purchase, enter a contest or promotion, communicate with us using our web forms to make a request or ask a question, submit a product review, take a survey or otherwise submit personal information to us with your communication. For example, we will request credit card and other identifying information to process a credit card transaction when you purchase a product through our website. We will also ask you for contact information in order to ship your product to you or the recipient that you designate.

We receive personal information about you from other sources. For example, we will receive information from credit card processors regarding whether the credit card details you gave us have been accepted or declined. We will receive information from shipping companies regarding whether the product we shipped was delivered or was undeliverable. We may also acquire information about you from other promotional or marketing companies with whom you shared your information and whom you have allowed to provide information to us.

**4. How Do We Use Your Personal Information?** We use your information to provide products and services and to manage our business operations. Some examples include:

- (a) to register your account;
- (b) to authenticate you when you log into your account;
- (c) to fulfil your requests for products and services;
- (d) to communicate with you about your requests;
- (e) to administer contests and promotions that you participate in;
- (f) to recommend or to offer you other products and services based on your inferred interests;
- (g) to post your product reviews;
- (h) to communicate with you regarding customer service issues and any product recalls or warranty service; and
- (i) to protect the security or integrity of our websites and our business.

We retain your information for as long as necessary to fulfil the purposes for which we collected the information or as required by law. We maintain a records retention and destruction program to destroy information when it is no longer needed or required.

**5. Personalised Experience and Web Analytics.** We also automatically collect information when you visit our website in order to customise your experience. For example, we collect information about what site referred you to our website, your browser type, operating system type and version, language, and your Internet Protocol ("IP") address. We also collect information about how you browse through our website, including logging the pages you visit and the amount of time you spend on certain pages. We use this information for a number of technical purposes to ensure that our pages load correctly in

your browser, as well as to personalise our offers to you. We also use this information to improve our website. For example:

- (a) we use IP addresses to correct pages for your geographical location;
- (b) we log the frequency of visits to certain pages on our website and how visitors navigate through our website in order to detect problems, improve our website and learn about what products and services are of interest to our customers;
- (c) we use information about products that you have clicked on to make suggestions about other products or services that you might be interested in viewing; and
- (d) we track whether certain types of promotional emails were opened by you and whether you sought information about a particular product or service in order to make inferences about other products and services you might be interested in.

In addition, if you create an account, we will use your purchase history with us and our affiliates to show you inventory based on your purchasing characteristics. This means that you may not see offers and inventory that other visitors to our site will see. If you would prefer not to have this level of customization, you may use our guest checkout experience and not create an account.

**6. Your Ad Choices: Interest-Based Advertising.** Our website uses small pixel files (small images) and cookies (small text files) to keep track of your browser so that you will be recognised when you visit other websites where our third party ad management providers may show you advertisements from us based on your visit to our website. Some of these advertisements may be customised to particular products and services that you viewed or they may be based on inferences about products and services that you might be interested in. This is called "interest-based advertising".

These pixel files and cookies are generally valid for a limited number of days (usually no more than 90 days) and are provided by our ad management providers. Visit Your AdChoices website (<http://www.youradchoices.com>) where you can find out more information about digital advertising and how you can opt-out of interest-based advertising. You can also opt-out of interest-based advertising using the link provided in any of our interest-based advertisements. Look for the Ad Choices icon or other link provided.

Please note that if you opt-out of interest-based advertising you may still see advertisements from us on other websites. However, they will not be customised based on your browsing history on our website. In addition, we will continue to customise our offers of products and services to you when you are on our website unless you block cookies from our website. If you block cookies on our website, certain functions, such as the "shopping cart" will not function properly because our website must recognise you as you move through the checkout process.

**7. Regarding Children and Minors.** Our website and the services offered on our website are not directed to children under the age of 13 years. We will not knowingly collect personal information about a child under the age of 13.

We do not allow minors (persons who are under the age of majority in their place of residence) to create accounts, make purchases or enter contests or promotions.

**8. Do We Disclose Your Personal Information to Others?** We may share your personal information with our service providers and our corporate affiliates that help us with our business operations. For example, we will share information about your shipping address with companies that provide shipping services to us. We share information with service providers or our affiliates who provide us with marketing and promotional services. We require our service providers and our affiliates to keep your personal information secure. In addition, our service providers may not use or disclose personal information for any purpose other than providing the services on our behalf unless we or they have obtained your consent.

We may transfer any information we have about you in connection with a merger or sale (including transfers made as part of insolvency or bankruptcy proceedings) involving all or part of our business or as part of a corporate reorganisation or stock sale or other change in corporate control.

We may also disclose your personal information if it is necessary for us to collect a debt from you or where we have reason to believe that it is relevant to the investigation or decision to investigate a breach of the laws of the Federal Republic of Nigeria or a foreign jurisdiction, and we are legally permitted to do so.

**9. Law Enforcement Requests.** We will disclose personal information without your knowledge or consent if we receive an order, subpoena, warrant or other legal requirement issued by a court, tribunal, regulator or other person with jurisdiction to compel disclosure of your personal information. If we receive a request from a police officer or other law enforcement agency for access to your personal information in the course of an actual or potential investigation, our policy is to require the police officer or law enforcement agency to obtain an order, subpoena or warrant, unless the information is urgently required to prevent serious bodily injury or serious damage to personal property. If we receive a written request from a police officer or other law enforcement agency with authority to request access to your personal information in the course of an actual or potential investigation into a breach of a law, our policy is to provide the requested information.

**10. Storage Outside of Nigeria.** Your personal information may be used or stored by us or our service providers and our corporate affiliates outside of Nigeria. We require that our service providers and our corporate affiliates safeguard your personal information. However, if your personal information is used or stored outside of Nigeria, it will also be subject to the laws of the country in which it is used or stored.

**11. Preference Centre.** If you register for an account, you will have the option to choose what marketing and promotional emails and communications you receive from us. You can also store information such as your home and shipping address and credit card information in order to make future purchases faster. You will also be able to review your order history, past product reviews and track shipments.

You can modify your information by logging into your account and making the requested changes. You cannot modify a product review once it has been submitted. However, you can delete your product review.

You may also choose "close my account" and we will remove your account information from active use. Any product reviews will be listed as from a "former user".

If you do not re-activate your account within 3 months, we may permanently delete your account. You may also contact us by one of the means set out in "Get Intouch" to make a deletion request. Please note that we still maintain information that you provided to us for audit purposes or to comply with our legal obligations. We may also de-identify your information in order to continue to use it for research and analytics purposes to understand our business, to make product improvements and to make available to third parties. We prohibit our employees and third parties from attempting to re-identify information that we have de-identified.

**12. How Do You Access and Modify Your Personal Information or Make a Complaint?** If you have an account, log in to access and to modify the personal information stored with your account. If you have questions or concerns about other personal information collected by us and would like assistance accessing that information, please contact our Chief Privacy Officer at [info@etiqafinans.com](mailto:info@etiqafinans.com).

**13. How Do We Protect Your Personal Information?** We take administrative, technical and physical measures to safeguard your personal information against unauthorised access, unauthorised disclosure, theft and misuse. This includes limiting access of employees to, and the use of, your personal information through the use of passwords and graduated levels of clearance. We do not publish all of our security measures online because this may reduce their effectiveness. We take physical precautions to ensure that the computer servers on which your personal information is stored and archived are secure and that access to such servers is protected. We educate our employees with respect to their obligations to protect your personal information and we require our affiliates and any third party service providers to take comparable steps to ensure the protection of any of your personal information that is shared with them.

Although we take precautions against possible breaches of our security systems, no company can fully eliminate the risks of unauthorised access to your personal information and no website is completely secure. We cannot guarantee that unauthorised access, hacking, data loss or breaches of our security systems will never occur. Accordingly, you should not transmit personal information to us using our website if you consider that information to be sensitive.

**14. Links to Third Party Websites and Social Network Plug-Ins.** You may be able to access third-party websites through links available on our websites. You may also connect to social networks such as Facebook, Twitter and other similar social network platforms. These links are provided on the website for your convenience. We do not have any control over those third-party websites and we do not provide any guarantee that the privacy practices of the hosts of those websites meet our standards. Your use of such third-party

websites is at your own risk and will be governed by the privacy policies of those websites and not by this Privacy Notice. Do not transmit personal information using those websites without reading the privacy policies governing those websites.

You may create links between our website and social networking sites. If you do so, we may be able to publish updates about our products and services to your social network account through the links that you establish. You may terminate those links at any time by modifying your social network account.

If you are logged into a social networking site when visiting our page, your visit to our website will be personalised based on your social networking profile.

You may change the way social networking sites and our sites interact by modifying your privacy settings in your social networking account. You can also log-out of your social networking account before visiting our website. For more information, please refer to your social networking site's privacy policy, which governs your use of these social plug-in features.

**15. Notice to Persons Outside of Nigeria.** This Privacy Notice is governed by the Laws of the Federal Republic of Nigeria. By submitting personal information to us, you understand that your personal information will be subject to the laws of the Federal Republic of Nigeria.