



PRIVACY POLICY



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1.0 Your Privacy Rights

This Privacy Policy describes your privacy rights regarding our collection, use, storage, sharing and protection of your personal information. It applies to First HoldCo Plc (FirstHoldCo) website and all database applications, services, tools, and physical contact with us regardless of how you access or use them.

If you have created a username, identification code, password, or any other piece of information as part of our access security measures, you must treat such information as confidential, and you must not disclose it to any third party. We reserve the right to disable any user identification code or password, whether chosen by you or allocated by us, at any time, if in our opinion you have failed to comply with any of the provisions of these Conditions. If you know or suspect that anyone other than you know your security details, you must promptly notify us at <https://first-holdco.com/>

2.0 Consent

You accept this Privacy Policy when you give consent upon access to our platforms, or use our services, content, features, technologies, or functions offered on our website, digital platforms or visit any of our offices for official or non-official purposes (collectively FirstHoldCo services). This Policy governs the use of FirstHoldCo services and intervention projects by our users and stakeholders unless otherwise agreed through written contract. We may amend this Privacy Policy at any time by posting a revised version on our website or placing such notice at conspicuous points at our office facilities. The revised version will be effective 7-days after publication.

3.0 Your Personal Information

When you use FirstHoldCo services, we collect information sent to us by your computer, mobile phone, or other electronic access device. The automatically collected information includes but not limited to- data about the pages you access, computer IP address, device ID or unique identifier, device type, geo-location information, computer and connection information, mobile

network information, statistics on page views, traffic to and from the sites, referral URL, ad data, standard web log data, still and moving images.

We may also collect information you provide us including but not limited to- information on web form, survey responses account update information, email, phone number, organisation you represent, official position, correspondence with FirstHoldCo support services and telecommunication with FirstHoldCo. We may also collect information about your transactions, enquiries and your activities on our platform or premises.

We may also use information provided by third parties like social media sites. Information about you provided by other sites are not controlled by FirstHoldCo and we are therefore not liable for how they use it.

4.0 What we do with your personal information

The purpose of our collecting your personal information is to give you efficient, enjoyable, and secure service. We may use your information to:

- Provide FirstHoldCo services and support.
- Process applications and send notices about your transactions to requisite parties.
- Verify your identity.
- Resolve disputes, collect fees, and troubleshoot problems.
- Manage risk, or to detect, prevent, and/or remediate fraud or other potentially prohibited or illegal activities.
- Detect, prevent, or remediate violation of Laws, Regulations, Standards, Guidelines and Frameworks.
- Improve FirstHoldCo services by implementing aggregate customer or user preferences.

- Measure the performance of the FirstHoldCo services and improve content, technology, and layout.
- Track information breach and remediate such identified breaches.
- Manage and protect our information technology and physical infrastructure.
- Contact you at any time through your provided telephone number, email address or other contact details.

5.0 Cookies

Cookies are small files placed on your computer's hard drive that enables the website to identify your computer as you view different pages. Cookies allow websites and applications to store your preferences to present contents, options or functions that are specific to you. Like most interactive websites, our website uses cookies to enable the tracking of your activity for the duration of a session. Our website uses only encrypted session cookies which are erased either after a predefined timeout period or once the user logs out of the platform and closes the browser. Session cookies do not collect information from the user's computer. They will typically store information in the form of a session identification that does not personally identify the user.

6.0 How we protect your personal information

We store and process your personal information on our computers in Nigeria. Where we need to transfer your data to another country, such country must have an adequate data protection law. We will seek your consent where we need to send your data to a country without an adequate data protection law. We protect your information using physical, technical, and administrative security measures to reduce the risks of loss, misuse, unauthorised access, disclosure, and alteration. Some of the safeguards we use are firewalls and data encryption, physical access controls to our data centres, and information access authorisation controls.

7.0 How We Share your information within FirstHoldCo and other users

During your interaction with our website or premises, we may provide other Ministries, Departments, Agencies (MDA), other organs of government, private sector operators performing government functions, with information such as your name, contact details, or other details you provide us for the purpose of performing our statutory mandate to you or third parties.

We work with third parties, especially government agencies to perform FirstHoldCo services and implement its mandate. In doing so, a third party may share information about you with us, such as your email address or mobile phone number.

You accept that your pictures and testimonials on all social media platforms about FirstHoldCo can be used for limited promotional purposes by us. This does not include your trademark or copyrighted materials.

From time to time we may send you relevant information such as news items, enforcement notice, statutorily mandated notices, and essential information to aid the implementation of our mandate. We may also share your personal information in compliance with National or international laws, crime prevention and risk management agencies and service providers.

8.0 Security

We will always hold your information securely. To prevent unauthorised access to your information, we have implemented strong controls and security safeguards at the technical and operational levels. This site uses Secure Sockets Layer/Transport Layer Security (SSL/TLS) to ensure secure transmission of your personal data. You should see the padlock symbol in your URL address bar once you are successfully logged into the platform. The URL address will also start with https:// depicting a secure webpage. SSL applies encryption between two points such as your PC and the connecting server. Any data transmitted during the session will be encrypted before transmission and decrypted at the receiving end. This is to ensure that data cannot be read during transmission.

FirstHoldCo has also taken measures to comply with global Information Security Management Systems (ISMS) we therefore have put in place digital and physical security measures to limit or eliminate possibilities of data privacy breach incidents.

9.0 Data Confidentiality Rights

Your information is regarded as confidential and will not be divulged to any third party except under legal and/or regulatory conditions. You have the right to request sight of, and copies of all information we keep on you, if such requests are made in compliance with the Freedom of Information Act and other relevant enactments. While FirstHoldCo is responsible for safeguarding the information entrusted to us, your role in fulfilling confidentiality duties includes, but is not limited to, adopting, and enforcing appropriate security measures such as non-sharing of passwords and other platform login details, adherence with physical security protocols on our premises, dealing with only authorised officers of the Agency.

10.0 Links to Other Websites and Premises

Certain transaction processing channels may require links to other websites or Organisations other than ours. Please note that FirstHoldCo is not responsible and has no control over websites outside its domain. We do not monitor or review the content of other party's websites which are linked from our website or media platforms. Opinions expressed or materials appearing on such websites are not necessarily shared or endorsed by us, and FirstHoldCo should not be regarded as the publisher of such opinions or materials. Please be aware that we are not responsible for the privacy practices, or content of these sites. We encourage our users to be aware of when they leave our site and to read the privacy statements of these sites. You should evaluate the security and trustworthiness of any other site connected to this site or accessed through this site yourself, before disclosing any personal information to them. FirstHoldCo will not accept any responsibility for any loss or damage in whatever manner, howsoever caused, resulting from your disclosure to third parties of personal information.

11.0 Governing Law

This Privacy Policy is made pursuant to the Nigeria Data Protection Act (2023) and other relevant Nigerian laws, regulations, or international conventions applicable to Nigeria. Where any provision of this Policy is deemed inconsistent with a law, regulation or convention, such provision shall be subject to the overriding law, regulation, or convention.