



PRIVACY POLICY

1.0 YOUR PRIVACY FIRST

At FirstHoldCo Plc (FirstHoldCo), we value the protection of your personal information and are committed to processing it responsibly and in compliance with applicable data protection laws and regulations in all countries in which FirstHoldCo Plc operates.

2.0 FIRSTHOLDCO AND YOU

Our Privacy Policy describes your privacy rights regarding our collection, use, storage, sharing, disclosing and protection of personal data, whether you interact with us online, digitally, physically, or through any other channel. By engaging with us, you agree to the practices described in this Privacy Policy.

This Privacy Policy applies to all personal data processed by FirstHoldCo in the course of:

- Corporate governance and group oversight
- Regulatory, supervisory, and statutory compliance
- Investor, shareholder, and capital market engagements
- Employment, recruitment, and human capital management
- Vendor, consultant, and third-party relationships
- Use of the FirstHoldCo website, digital platforms, and physical premises

This Policy governs all FirstHoldCo services, platforms, tools, databases, and intervention projects unless otherwise agreed by a written contract.

3.0 CONSENT

We don't ask for your personal information unless we need it to provide or improve our services for you. We want to be sure we have your consent to collect, use and, where necessary, share your information with our partners and vendors that help us serve you. You will be considered to have given your consent to FirstHoldCo for the processing of your personal data when you:

- Access or use our website or digital platforms
- Visit any of our offices for official or non-official purposes

- Submit information through forms, surveys, correspondence, or applications
- Communicate with FirstHoldCo through email, telephone, or electronic channels

4.0 YOUR PERSONAL INFORMATION

4.1 Information You Provide to Us.

We may collect personal data directly from you, including but not limited to:

- Name, email address, phone number, postal address
- Organisation represented and official designation
- Employment applications, CVs, and recruitment information
- Correspondence with FirstHoldCo staff or support services
- Survey responses, complaints, enquiries, and meeting records.

4.2 Automatically Collected Information

When you use our website, digital platforms or visit our office, we may automatically collect:

- IP address and device identifiers
- Pages accessed, traffic data, and referral URLs
- Standard web log data
- Still and moving images (CCTV footage at our premises)

4.3 Third-Party Information

We may receive personal data from third parties (e.g. regulators, service providers, social media platforms). Such third-party platforms are not controlled by FirstHoldCo, and we are not responsible for their independent privacy practices.

5.0 INFORMATION WE HOLD ABOUT YOU

The categories of personal data processed by FirstHoldCo include:

Personal Data Type	Description of Personal Data
Identity Data	Your personal details such as name, nationality, date of birth, photographs, and government-issued identification documents (where applicable).
Contact Data	Your contact details such as residential or business address, telephone number, email address, and other contact information provided to FirstHoldCo.
Employment and HR Data	Any personal information you provide to FirstHoldCo Plc as part of recruitment or employment processes, including job applications, curriculum vitae, employee records, performance information, and training records.
Investor and Shareholding Data	Information relating to shareholders and investors, including shareholder registers, shareholding structure, dividend records, investor communications, and statutory filings.
Technical and Usage Data	Information generated from the use of our website or digital platforms, including log data, IP address, browser type, device identifiers, session data, access times, and interaction history.
Security Data	Security-related information such as CCTV recordings, access control records, visitor logs, and other monitoring data collected within or around FirstHoldCo premises for safety and security purposes.
Communications Data	Records of communications between you and FirstHoldCo, including emails, letters, forms, enquiries, complaints, meeting records, and call recordings (where applicable).

6.0 WHY DO WE NEED THE DATA?

FirstHoldCo processes personal data only where necessary and on a lawful basis.

Purpose of Processing	Description of Purpose	Lawful basis of Processing
Corporate governance and group oversight	Processing personal data to support FirstHoldCo's corporate governance responsibilities, including board and management activities, decision-making, reporting, internal controls, and oversight of subsidiaries within the Group.	Legal obligation – Processing is necessary to comply with corporate, financial, and regulatory governance obligations imposed by applicable laws and regulators.
Regulatory & statutory compliance	Processing personal data to meet legal, regulatory, supervisory, and statutory requirements, including engagements with regulators, filings, disclosures, audits, investigations, and compliance reporting.	Legal obligation – Processing is required to comply with laws, regulations, directives, and regulatory expectations applicable to FirstHoldCo.
Employment and HR management	Processing personal data for recruitment, onboarding, employment administration, performance management, training, remuneration, disciplinary procedures, and employee exit processes.	Performance of a contract Processing is necessary to perform employment contracts or take steps at the request of the data subject prior to entering into such contracts.
Investor & shareholder engagement	Processing personal data to manage shareholder registers, dividends, investor communications, general meetings, corporate actions, and capital market engagements.	Legal obligation / Legitimate Interest Processing is required by law and also necessary to support effective investor relations and protect the Company's and shareholders' legitimate interests.
Risk management & fraud prevention	Processing personal data to identify, assess, monitor, and mitigate risks, including fraud, misconduct, security threats, conflicts of interest, and other activities that may expose FirstHoldCo to financial, legal, or reputational harm.	Legitimate interest Processing is necessary to safeguard FirstHoldCo, its subsidiaries, stakeholders, and the financial system, provided such interests do not override data subject rights.

Website security and administration	Processing personal data generated through the use of FirstHoldCo's website and digital platforms to ensure functionality, security, system integrity, access control, performance monitoring, and incident management.	Legitimate interest Processing is necessary to ensure secure, reliable, and efficient operation of our digital platforms and to prevent unauthorised access or misuse.
Stakeholder communication	Processing personal data to communicate with stakeholders, including employees, investors, regulators, vendors, and members of the public, for enquiries, updates, notices, engagements, and relationship management.	Consent / Legitimate interest Processing may be based on consent where required, or on FirstHoldCo's legitimate interest in maintaining effective communication with stakeholders.

7.0 USE OF YOUR INFORMATION

We use personal data to:

- Provide and support FirstHoldCo services
- Process applications and statutory engagements
- Verify identity where required
- Resolve disputes and manage complaints
- Detect, prevent, and remediate fraud or unlawful activities
- Improve services, content, and technology
- Track, manage, and remediate information security incidents
- Communicate with you regarding services, updates, and marketing (where consented).
- Protect our information technology and physical infrastructure
- Communicate with stakeholders when necessary
- Conduct internal research, audits, and risk management
- Comply with legal and regulatory obligations

8.0 SHARING OF INFORMATION

We may share your information with:

- Affiliates and Subsidiaries: To provide and manage services.

- Service Providers: Such as payment processors, technology providers, auditors, and consultants.
- Regulators and Legal Authorities: When required by law, regulation, or legal process.
- Business transactions: In connection with mergers, acquisitions, or asset sales.

We never sell your personal information to third parties.

Data Security

We implement administrative, technical, and physical safeguards to protect your information against unauthorized access, disclosure, alteration, and destruction. However, the mode of transmission over the Internet or electronic storage is completely secured.

9.0 INFORMATION SHARING AND DISCLOSURE

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. This does not include your trademark or copyrighted materials.

All disclosures are subject to appropriate confidentiality and data protection safeguards.

10.0 CROSS-BORDER DATA TRANSFER

We process personal data both within and outside Nigeria. Where cross-border data transfers are necessary, we rely on legally mandated instruments and mechanisms authorized under applicable laws. These transfers are subject to the Nigeria Data Protection Commission (NDPC) adequacy decisions, appropriate safeguards, or other lawful mechanisms. While countries where we process data may have

regulations that differ from and may be less protective than those in Nigeria or the EU, FirstHoldCo will ensure that any third-party processor meets core regulatory standards prior to processing.

11.0 PRIVACY OF CHILDREN

We respect the privacy of children and only process their personal information with the consent of their legal representative. Protecting the privacy of minors is a responsibility we take seriously. Whenever it becomes necessary to collect or process personal data of children, FirstHoldCo ensures that such processing is carried out only with the explicit consent of the child's parent or legal guardian, and strictly for purposes consistent with our lawful objectives.

12.0 INFORMATION PROTECTION

FirstHoldCo 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 staff are trained to ensure that your personal information is not disclosed and safe as stated in this policy.

FirstHoldCo will ensure that the personal data in our custody is secure and kept confidential as expected. We implement generally accepted technical and organizational measures to protect your personal data against unauthorized or unlawful processing, accidental loss, destruction, or damage, including encryption where appropriate.

13.0 RETENTION

We will retain your personal information for such length of time as may be required by law, regulation, and the internal policies of FirstHoldCo. This retention period has been established to enable us to use personal data for the necessary legitimate purposes identified, in full compliance with the legal and regulatory requirements.

14.0 YOUR RIGHTS UNDER THIS POLICY

Under the Nigeria Data Protection Act 2023,

- i. You have the right to request confirmation as to whether FirstHoldCo processes your personal data and, where such processing exists, to request access to that personal data.
- ii. You have the right to request the correction of inaccurate, incomplete, or outdated personal data held by FirstHoldCo. Where necessary, you may also request that incomplete personal data be completed, taking into account the purpose(s) of processing.
- iii. Where the processing of your personal data is based on your consent, you have the right to withdraw such consent at any time. Withdrawal of consent shall not affect the lawfulness of processing carried out prior to the withdrawal. Please note that withdrawal of consent may affect FirstHoldCo's ability to continue providing certain services where consent is required for such processing.
- iv. You have the right to object to the processing of your personal data or to request that FirstHoldCo restricts processing in certain circumstances.
- v. You can request that your personal information be deleted or erased. However, we may continue to retain such personal information as may be required for compliance with legal, regulatory, or policy requirements.
- vi. Except in scenarios clearly stated in the Nigerian Data Protection Act (NDPA). You have the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal or similar significant effects about you.

15.0 REMEDIES

Where you have concerns relating to the processing of your personal information by FirstHoldCo, or require any clarification on this policy, please notify us through or contact details provided below:

Email: dataprotectionoffice@firstbankgroup.com

We will respond to your concerns within 30 days of receiving your notice.

You also have the right to lodge a complaint directly with the supervisory authority, Nigeria Data Protection Commission (NDPC) where you suspect any misconduct or violations of the above listed rights in section.

Email: Info@ndpc.gov.ng

Website: www.ndpc.gov.ng

16.0 LINKS TO OTHER WEBSITES

Our website may contain links to third party websites. FirstHoldCo does not control or endorse such websites and is not responsible for their privacy practices. Users are encouraged to review the privacy policies of external sites before sharing personal data.

17.0 GOVERNING LAW

This Privacy Policy is governed by the Nigeria Data Protection Act 2023 and other applicable Nigerian laws, regulations, or international conventions applicable to Nigeria. Where any provision conflicts with applicable law, the law shall prevail.

18.0 COOKIES

Cookie policy

1. Introduction.

Our website, (hereinafter: "the website") uses cookies and other related technologies (for convenience all technologies are referred to as "cookies"). Cookies are also placed by third parties we have engaged. In the document below we inform you about the use of cookies on our website.

2. What are cookies?

A cookie is a small simple file that is sent along with pages of this website and stored by your browser on the hard drive of your computer or another device. The information stored therein may be returned to our servers or to the servers of the relevant third parties during a subsequent visit.

3. What are scripts?

A script is a piece of program code that is used to make our website function properly and interactively. This code is executed on our server or on your device.

4. What is a web beacon?

A web beacon (or a pixel tag) is a small, invisible piece of text or image on a website that is used to monitor traffic on a website. In order to do this, various data about you is stored using web beacons.

5. Cookies

5.1 Technical or functional cookies

Some cookies ensure that certain parts of the website work properly and that your user preferences remain known. By placing functional cookies, we make it easier for you to visit our website. This way, you do not need to repeatedly enter the same information when visiting our website and, for example, the items remain in your shopping cart until you have paid. We may place these cookies without your consent.

5.2 Statistics cookies

We use statistics cookies to optimize the website experience for our users. With these statistics cookies we get insights in the usage of our website. We ask your permission to place statistics cookies.

5.3 Tracking cookies

Tracking cookies are cookies or any other form of local storage, used to create user profiles to track the user on this website or across several websites for similar marketing purposes.

5.4 Social Media

On our website, we have included content from Facebook, Twitter, LinkedIn, WhatsApp and Instagram to promote web pages (e.g. "like", "pin") or share (e.g. "tweet") on social networks like Facebook, Twitter, LinkedIn, WhatsApp and Instagram. This content is embedded with code derived from Facebook, Twitter, LinkedIn, WhatsApp and Instagram and places cookies. This content might store and process certain information for personalized advertising.

Please read the privacy statement of these social networks (which can change regularly) to read what they do with your (personal) data which they process using these cookies. The data that is retrieved is anonymized as much as possible. Facebook, Twitter, LinkedIn, WhatsApp and Instagram are located in the United States

6. Consent

When you visit our website for the first time, we will show you a pop-up with an explanation about cookies. As soon as you click on "Save preferences", you consent to us using the categories of cookies and plug-ins you selected in the pop-up, as described in this Cookie Policy. You can disable the use of cookies via your browser, but please note that our website may no longer work properly.

6.1 Manage your consent settings

Functional Always active

Technical storage or access is strictly necessary for the legitimate purpose of enabling the use of a specific service explicitly requested by the subscriber or user, or for the sole purpose of carrying out the transmission of a communication over an electronic communications network.

Preferences

The technical storage or access is necessary for the legitimate purpose of storing preferences that are not requested by the subscriber or user.

Statistics

The technical storage or access that is used exclusively for statistical purposes. The technical storage or access that is used exclusively for anonymous statistical purposes. Without a subpoena, voluntary compliance on the part of your Internet Service Provider, or additional records from a third party, information stored or retrieved for this purpose alone cannot usually be used to identify you.

Marketing

The technical storage or access is required to create user profiles to send advertising, or to track the user on a website or across several websites for similar marketing purposes.

7. Enabling/ disabling and deleting cookies

You can use your internet browser to automatically or manually delete cookies. You can also specify that certain cookies may not be placed. Another option is to change the settings of your internet browser so that you receive a message each time a cookie is placed. For more information about these options, please refer to the instructions in the Help section of your browser.

Please note that our website may not work properly if all cookies are disabled. If you do delete the cookies in your browser, they will be placed again after your consent when you visit our websites again.

19.0 UPDATES TO THIS PRIVACY POLICY

This policy shall be reviewed in accordance with the company's three (3) year review cycle and/or as may be deemed necessary. Any amendments will undergo appropriate approval processes. In the event of changes to how we use personal information, we will provide notice by posting a prominent update on our website.