

PRIVACY NOTICE: ICMG SECURITIES LIMITED

ICMG SECURITIES LIMITED understands that your privacy is important and that you care about how your personal data is used and shared online. ICMG respects the privacy of everyone who visits our website and uses our online services.

ICMG is committed to respecting, securing, and protecting your personal data. ICMG is also committed to being transparent about what ICMG collects from you and how ICMG uses it.

This privacy policy covers information practices, including how ICMG uses, shares and secures the personal information you provide and your legal rights.

Our contact details.

Address: 24 Ademola Street, Off Awolowo Road, South West Ikoyi, Lagos.

Tel.: 08022887783

E-mail: info@icmgsecuritiesng.com

YOUR RIGHTS

Under the Nigerian Data Protection Regulation (NDPR), you have several rights about your personal data. This policy has been designed to uphold your rights where ICMG act as a data processor:

- **Right of access** - you have the right to request a copy of the information that ICMG holds about you.
- **Right of rectification** - you have a right to correct data that ICMG holds about you that is inaccurate or incomplete.
- **Right to be forgotten** - in certain circumstances you can ask for the data ICMG holds about you to be erased from ICMG's record.
- **Right to restriction of processing** - where certain conditions apply, you have a right to restrict the processing of certain data about you.
- **Right of portability** - you have the right to have the data ICMG holds about you transferred to another organization.
- **Right to object** - you have the right to object to certain types of processing such as direct marketing.
- **Right to object to automated processing, including profiling** - you also have the right not to be subject to automated processing or profiling.
- **Right to judicial review** - if ICMG refuses your request under rights of access, ICMG will provide you with a reason to why. You have the right to complain as detailed below.



YOUR RIGHT TO COMPLAIN

If you wish to make a complaint about how your personal data is being processed or how your complaint has been handled, you have the right to lodge a complaint directly to ICMG's in-house data officer or with the supervisory authority.

If ICMG is unable to help, or you are not satisfied with our response, you also have the right to lodge a complaint with the National Information Technology Development Agency (NITDA).

NITDA can be contacted:

By post - No 28, Port Harcourt Crescent, Off Gimbiya Street, P.M.B 564, Area 11,
Garki, Abuja, Nigeria.

By telephone - 08168401851

Via its website - www.nitda.gov.ng

ICMG would, however, appreciate the chance to deal with your concerns before you approach NITDA, so please contact us in the first instance.

WHAT DATA DO ICMG COLLECT FROM YOU?

By expressing an interest in our services, visiting our websites or registering to use our service, ICMG may collect personal information from you.

- **Contact information** such as name, company name, address, phone number and email address.
- **Financial information** such as billing name, billing address and credit/debit card details.
- **System information** such as IP Address, browser type and version, and operating system relating to information gathering tools such as cookies.
- **Other information** such as the number of people within your organization using our service.

HOW ICMG USE YOUR DATA

The data ICMG collects is used to educate and inform customers about our product and to improve ICMG's service. ICMG may also collect personal information about our prospective and existing customers, employees, vendors, and service providers.

The information collected is used to provide services to our customers. These may include but not limited to any of the following:

- Processing service requests
- Negotiating contracts
- Handling orders
- Processing payments
- Promotional offers and marketing
- Providing customer support
- Managing customer relationships
- Developing and improving our services
- Compliance with governmental, legislative and regulatory bodies, and investigating complaints about the use of our services

ICMG processes personal information for certain business purposes, which include some or all the following:

- Where the processing enables us ensure efficient transactional purpose
- Where the processing enables us to enhance, modify, personalize or otherwise improve our services/communications for the benefit of our customers
- To better understand how people interact with our websites

ICMG ensure that we only process data in the interests of our company in conducting and managing our business to enable us to give customers the best service/products and secure experiences. This is known as “Legitimate Interests”.

ICMG will only ever send you communications that ICMG feels are relevant to you. ICMG may process your information to protect you against fraud when transacting on our website, and to ensure our websites and systems are secure.

When processing your personal information for our legitimate interests, ICMG considers and balances any potential impact on you - both positive and negative and your rights under data protection laws.

Our legitimate business interests do not automatically override your interests. As such, ICMG will not use your personal data for activities where our interests are overridden by the impact on you, unless ICMG has your consent or are otherwise required or permitted to by law.

If you have any objection to our data processing by legitimate interests, please see *'your rights' section at the start of this policy.*

STORING AND SHARING YOUR INFORMATION

SUB-PROCESSORS - Who is a sub-processor?

In summary, a sub-processor is a third-party company engaged by ICMG to assist with data processing. ICMG sets a high standard in selecting sub-processors to ensure that they are secure, maintain strict privacy policies and adhere to confidentiality practices in processing data.

ICMG may share your data with these companies to provide services on you and on your behalf. These service providers, under contractual obligations, will use your personal information only as necessary to provide the requested services to us. ICMG will not sell, rent, or trade any information with third parties for promotional or marketing purposes.

The use of our service requires the sharing of data with sub-processors which are subject to rigorous privacy statements. To use our service, you must agree with our use of sub-processors.

BILLING

ICMG uses a third-party service provider to process orders. These third-party services are not permitted to store, retain, or use any billing information provided by us.

DISCLOSURE

If required by law or if disclosure is necessary to protect our rights and/or to comply with judicial proceedings, court order, or legal process, ICMG reserves the right to disclose any relevant information.

COMMUNICATION

When you provide information through one of our webforms or other avenues, ICMG might provide you with further information about our services. You can manage your subscription preferences at any time and unsubscribe from this information.

Should you request information from us, ICMG will use the data you provide to process this request. For example, by completing our *'Access request form'*, ICMG will get a better understanding of your requirements.

ICMG may use information you provided to contact you to further discuss your interest in our services and to send you information regarding us and our affiliates. ICMG will only process the information you provide on the grounds of legitimately meeting your requirements.

To consistently provide an expected level of service, ICMG may also use information collected to update, expand and analyze our records to create a more befitting service for you.

For further enquiries about receiving marketing communications, contact us or telephone.

KEEPING YOUR DATA UP-TO-DATE

ICMG may retain your information for a period consistent with the original reason it was collected. Upon entering into an agreement with us, ICMG reserves the right to store and use your information. Upon termination of the agreement, ICMG would keep your information for required legal reasons.

As a customer, you have the right to request to review, correct, delete or otherwise modify any of the personal information you may have previously provided to us, at any time. As a user of our product, you may generally update information wherever necessary. To update your billing information or terminate your agreement with us, you can contact us. For other requests: erasure, access, portability, rectification, and objection, your requests will be addressed within thirty (30) days.

YOUR DATA

ICMG's customers submit data and information, whether electronically or by other means, to us for processing purposes. ICMG will not review, share, alter or distribute this data unless otherwise requested by law. ICMG only accesses your data only for the purposes of continuing to provide our services or to prevent or address any service or technical problems.

As stated above, the information ICMG holds about you can be accessed upon request.

COOKIES

ICMG's website uses cookies. A cookie is a small file of letters and numbers that ICMG puts on your computer if you agree. These cookies allow us to distinguish you from other users of our website, which helps us to provide you with a good experience when you browse our website and also allows us to improve our site. You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly. Cookies enable websites and applications to store your user preferences in order to enhance your overall website experience by better understanding your preferences, likes and dislikes. They also allow websites to identify when users are logged on their site and when they return to their site, test new content and analyze web traffic with data analytics.

Apart from the data that you elect to disclose and share with us, we are in no way able to access your computer or any other information about you with cookies. Although most web browsers automatically accept cookies, you can amend your browser settings to disable cookies. This may, however, prevent you from fully experiencing the website as it was intended.

To find out more about cookies, [visit www.allaboutcookies.org](http://www.allaboutcookies.org).

SECURITY

As part of delivering optimum service to our customers, ICMG takes extra security measures to maintain your data in a secure and organized manner. Only authorized employees from our organization can access, alter, disclose and destroy personal data, when required. In addition, these employees only act within the scope of their authority and are trained to prevent any errors or omissions.

ICMG also carries out ongoing security monitoring exercises to ensure that our systems are updated and adopt appropriate industry data collection, storage, and processing practices.

Physical security measures are in place to protect against unauthorized access, alteration, disclosure of personal information, username, password, transaction information and data stored in your user account. Access to your name and address is restricted to our employees who need to know such information in connection with delivering our services to you and are bound by legal confidential obligations.

GOVERNING LAW

This privacy policy is made pursuant to the Nigeria Data Protection Regulation 2019 (or any subsequent amendments thereof) 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.

ICMG reserves the right to change this privacy policy.

All enquiries about this privacy policy should be directed to: dpo@icmgsecuritiesng.com

Effective: August 2021