



STONEX FINANCIAL NIGERIA LIMITED

PRIVACY NOTICE

1. Introduction/Scope

This document is prepared in accordance with the provisions of the EU General Data Protection Regulation (GDPR) and the Nigerian Data Protection Regulation (NDPR). It sets out how SFN applies and complies with the principles of the regulations in processing the personal data of individuals, clients, vendors, and even third parties that interact with SFN.

For personal data of individuals, this document also highlights their rights and covers the data subject(s) whose personal data is collected and processed in compliance with the GDPR/NDPR.

2. Roles and Responsibilities

Roles	Responsibilities
Data Protection Officer	<ul style="list-style-type: none"> To ensure that this notice is correct and up-to-date, and bring this notice to the awareness of data subjects prior to the collection and processing of personal data by the SFN.
All employees/staff who interact with personal data	<ul style="list-style-type: none"> To follow the provisions of this policy document. To ensure that this notice is brought to the attention of the data subject(s).

3. Policy Statement

3.1 Who We Are

StoneX Financial Nigeria Limited is a private limited liability company incorporated by the Corporate Affairs Commission of Nigeria ('SFN', 'we', 'us', 'our'). It is domiciled in Nigeria and principally engages in trading in fixed income and equities securities on behalf of institutional investors.

3.2 What Personal Data Do We Need?

The types of personal data we collect and process, depending on the particular processing requirement, are under the following categories:

Personal Data Type	Sources
Identity data	Account opening form, onboarding documents
Contact data	Account opening form, onboarding documents
Financial data	Onboarding documents
Transaction data	SLAs with vendors
Usage data	Website
Technical data	Website

In certain instances, the personal data we need to collect may fall under a special category of personal data, which includes: race, political opinion, ethnic origin, religion, philosophical beliefs, genetic/biometric data, health record, sex life/sex orientation, criminal records, or alleged criminal activity. In such instances, our lawful basis of processing will be the explicit consent of the data subject, compliance with a legal obligation, or for legal proceedings/advice.

3.3 Why Do We Need the Data?

SFN ensures that the personal data collected and processed is necessary for the purpose of collection, and SFN shall not collect or process more data than is reasonably required for a particular processing activity. In addition, every processing purpose has at least one lawful basis for processing to safeguard the rights of the data subjects, as listed below:

Purpose of Processing	Lawful Basis of Processing
Identity verification and maintenance of records	Compliance with a legal obligation in which SFN is subject or necessary for our legitimate interests
Create log in details for staff on required applications	Necessary for our legitimate interests
Payments to employees salaries, taxes, pension and NHF remittances	Compliance with a legal obligation in which SFN is subject or performance of a contract
Make bookings e.g. hotel reservations, visa processing, flight tickets and chauffeur/transport services	Compliance with a legal obligation in which SFN is subject or necessary for our legitimate interests
Trades settlements	Compliance with a legal obligation in which SFN is subject or performance of a contract

4. Consent

Generally we do not rely on consent as a legal basis for processing your personal data. If, for any reason, SFN is requesting sensitive personal data from you, you will be rightly notified why and how the information will be used.

You may withdraw consent at any time by requesting a withdrawal of consent form.

5. Disclosure

We may share your personal information with:

- regulatory and tax authorities;
- such third parties as we reasonably consider necessary in order to prevent crime, e.g. the police;
- our associated companies;

- third-party service providers and advisers who provide us with administrative, financial, research or other services in connection with the services we provide to you;
- commercial partners;
- our professional advisers;
- our auditors for the purposes of carrying out financial and regulatory audits;
- our agents, including credit reference agencies, acting on our behalf, carrying out such credit and identity checks, including money laundering checks, compliance regulatory reporting and fraud prevention checks, as we may reasonably consider necessary or desirable, including requesting a reference from your bank or any credit reference agency. Any third party referred to in this clause may share any personal information concerning you with us and other organisations involved in credit reference, the prevention of fraud and/or crime and/or money laundering or for similar purposes or to recover debts involved;
- courts, tribunals, regulatory or tax authorities and government agencies to enable us to enforce our agreement with you or to comply with the requirements of a court, regulator, tax authority or government agency;
- the purchaser or potential purchaser of one or more of our businesses or product/service lines and their professional advisers; and
- our trade repository.

Where there is a need for a third party to process the personal data of data subjects, SFN will enter into an agreement with the third party and be satisfied that the third party has adequate measures in place to protect the data against accidental or unauthorised access, use, disclosure, loss, or destruction.

In a case where the disclosure is to third parties outside the jurisdiction of the GDPR and NDPR, SFN will ensure that the third party meets the core regulatory standards prior to the transfer. This may include transferring the personal data to the third party where SFN has satisfied that:

- the country of the recipient has adequate data protection controls established by legal or self-regulatory regime;
- SFN has a contract in place that uses existing or approved data protection clauses to ensure adequate protection;
- SFN is making the transfer under approved binding corporate rules;
- SFN is relying on approved codes of conduct or certification mechanisms, together with binding and enforceable commitments in the foreign country or international organisation to apply the appropriate safeguards in relation to data subject rights; or
- Provisions inserted into administrative arrangements between public authorities or bodies authorised by the competent supervisory authority.

6. Retention of Records

In compliance with the GDPR/NDPR data retention policy, SFN will process your personal data for as long as you remain a client of SFN and will retain the personal data for five (5) years after the client ceases to be a client.

This retention period has been established to enable us use the personal data for the necessary legitimate purposes identified, in full compliance with the legal and regulatory requirements. When we no longer need to use your personal information, we will delete it from our systems and records, and/or take steps to encrypt/anonymise it to protect your identity as the case may be.

7. Data Subject Rights

Data subjects, according to the provision of the GDPR/NDPR, have certain rights. At any point while SFN are in possession of or processing your personal data, you, the data subject, have the right to:

- Request a copy of the information that we hold about you
- Correct the data that we hold about you that is inaccurate or incomplete
- Ask for the data we hold about you to be erased from our systems/record
- Restrict processing of your personal data where certain conditions apply
- Have the data we hold about you transferred to another organisation
- Object to certain types of processing like direct marketing
- Object to automated processing like profiling, as well as the right to be subject to the legal effects of automated processing or profiling
- Judicial review. In the event that SFN refuses your request under rights of access, we will provide you with a reason as to why. And you have the right to complain as outlined in clause 8 below.

All of the above requests will be forwarded on should there be a third party involved in the processing of your personal data.

8. Complaints

If for any reason you wish to make a complaint about how SFN processes your personal data, or how your complaint has been handled, you have the right to lodge a complaint directly with the supervisory authority and the Data Protection Officer of SFN.

Below are the details for each of these contacts:

	Supervisory Authority	Data Protection Officer (DPO)
Contact Name:	Mary Edosomwan	Ruth Adesida
Address:	8th Floor Post Square, Plot 1039 Adeola Odeku Street, Victoria Island, Lagos	8th Floor Post Square, Plot 1039 Adeola Odeku Street, Victoria Island, Lagos
Email:	Mary.Edosomwan@StoneX.com	Ruth.Adesida@StoneX.com
Telephone:	+234 1700 0103	+234 1700 0104