
CHAPEL HILL  DENHAM

DATA PRIVACY POLICY

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1. INTRODUCTION

At Chapel Hill Advisory Partners Limited and its subsidiaries (collectively referred to as “Chapel Hill Denham”/“We”/“Our”), we recognize that your privacy is important, and we are dedicated to protecting your data and privacy. Therefore, we treat your data and information (“data”) as private and confidential.

This Privacy policy (“the Policy”) outlines our continuous obligations to you in respect of how we manage your personal information. It also contains the details of personal information collected, the modality of collection, storage and usage of data collected. We believe this will help you make an informed decision about sharing your personal information with us.

Chapel Hill Denham strives to maintain the highest standards of decency, fairness and integrity in all our operations; we are equally dedicated to protecting the data of our Clients and online visitors (“user/ users”) while using our website and ecommerce platforms (“Site”).

In the light of this, you will be required to read and accept the terms of this Policy prior to accessing our websites, receiving our emails and/or utilizing our ecommerce portals.

2. PERSONAL INFORMATION

Personal information are details that identifies an individual such as names, addresses, email addresses, phone numbers and any other unique identifiable information (“Personal Information”).

We limit the collection and use of non-public personal information to the minimum we believe is necessary to deliver superior service to you. Services can include advising you about your investments, maintaining your account with us and other opportunities.

3. WHAT WE COLLECT

We obtain mostly non-public personal information directly from you or your agents whether in person, by telephone or electronically. This information may include without limitation::

- First name, last name and job title;
- Contact information including home address, email address, business address, home telephone numbers and business telephone numbers;
- Banking information, including your Bank Verification Number (“BVN”);
- Occupation;
- Non-personal identification information such as browser name, type of computer and technical information about your means of connection to our site, such as the operating system and the internet service providers utilized; and
- Other information relevant to customer surveys and/or offers.

4. DISCLOSURE OF PERSONAL INFORMATION

We do not disclose any Personal Information about our investors, former investors or stakeholders to anyone, except when we believe it is necessary for fulfillment of our obligations to the investor, stakeholder or under an agreement with the Investor, or with the consent of the investor, or where disclosure is required by law. Except otherwise indicated herein, we will not make any disclosures of non-public personal information to other third parties who may want to sell their products or services to you.

5. WHAT WE DO WITH THE INFORMATION WE COLLECT

We require this information to understand your needs which will enable us to provide you with better products as well as smart service solutions. Other operational reasons:

- Internal record keeping;
- To improve our products and services;
- To improve our service delivery;
- To contact you occasionally for market research purposes;
- To send emails about new investment opportunities, investment valuation statements or other information which we believe would be of importance to you; and
- To improve our site through feedback you provide on products and services.

6. COOKIES

We utilize cookies to improve your user experience on our websites. Cookies are messages that web servers pass to your web browser when you visit internet sites and typically contain information about your visit to a specific web page, track website activities, as well as any information you have volunteered, such as name and interests. This is to ensure that you do not have to re-enter this information each time you visit the site.

You can however choose to accept or decline cookies. Most web browsers automatically accept cookies, but you can modify your browser setting to decline cookies if you prefer. However, this may prevent you from taking full advantage of the website.

7. LINKS TO OTHER WEBSITES

Our Site may contain links to other websites of interest. However, Chapel Hill Denham shall NOT be responsible for the protection and privacy of any information which you provide whilst visiting such websites; such websites are not governed by this policy. You should exercise caution and review the privacy statement(s) applicable to that websites.

8. SECURITY OF PERSONAL INFORMATION

Your Personal Information is stored in a manner that reasonably protects it from misuse, loss, unauthorized access and/or modification.

When your Personal Information is no longer needed for the purpose for which it was obtained, we will take reasonable steps to destroy or permanently de-identify your Personal Information. However, most of the Personal Information is or will be stored in client files, which will be kept by us for a minimum of seven (7) years.

9. ACCESS TO PERSONAL INFORMATION

You may access your Personal Information in order to update and/ or correct the details, subject to certain exceptions. If you wish to access your personal information, please contact us in writing.

To protect your personal identification, we will require some form of identification from you before releasing the requested information.

10. MAINTAINING THE QUALITY OF YOUR INFORMATION

It is important to us that your Personal Information is updated regularly. We will take reasonable steps to make sure that your Personal Information is accurate, complete and up-to-date. If you find that the information we have is not up to date or is inaccurate, please inform us as soon as practicable so we can update our records and ensure we can continue to provide quality services to you.

This policy may change from time to time, to reflect changes in our practices and/or applicable law and regulation.

If you have any queries or seek to withdraw your consent, please contact us at visa the information below and we shall respond accordingly:

Chapel Hill Denham

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NIGERIA

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