

PRIVACY POLICY

We at FDC Advisory Limited (hereinafter the “**Company**” of “**FDC**”) respect your privacy and are committed to protecting it through our compliance with this privacy policy (the “**Policy**”). This policy describes:

THE TYPE OF INFORMATION WE MAY COLLECT OR THAT YOU MAY PROVIDE WHEN YOU DOWNLOAD, REGISTER WITH OR USE THE EVERGROW APPLICATION DOWNLOADABLE TO YOUR MOBILE DEVICE (the “**App**”).

OUR PRACTICES FOR COLLECTING, USING, MAINTAINING, PROTECTING AND DISCLOSING THAT INFORMATION.

This Policy applies only to information we collect on the App and in email, text and other electronic communications sent through or in connection with the App. This policy DOES NOT apply to information that:

We collect offline or on any other FDC apps or websites including websites you may access through the App,

You provide to or is collected by any third party (see Third-Party Information Collection).

Please read this Policy carefully to understand our policies and practices regarding your information and how we will treat it. If you do not agree with our policies and practices, do not download, register with or use the App. By downloading, registering with or using the App, you agree to this Policy. This Policy may change from time to time (see Changes to This Policy). Your continued use of the App after we revise this Policy means you accept those changes, so please check this Policy periodically for updates.

INFORMATION WE COLLECT AND HOW WE COLLECT IT

We collect information from and about users of the App directly from you when you provide information to us and automatically when you use the App.

INFORMATION YOU PROVIDE TO US

When you download, register with or use the App, we may ask you to provide information: By which you may be personally identified, such as your name, address, email, telephone number, bank verification number, birth date, financial information or any combination of information that could be used to identify you (“personal information”)

That is about you but individually does not identify you, such as: information you provide by filling in forms on the App. This includes information provided at the time of registering to use the App. We may also ask you for information when you report a problem with the App.

Records and copies of your correspondence (including email addresses and phone numbers) if you contact us.

Your responses to surveys or questions that we might ask you to complete details of transactions you carry out through the App.

AUTOMATIC INFORMATION COLLECTION

When you download, register with or use the App, it may use technology to automatically collect:

USAGE DETAILS.

When you access and use the App, we may automatically collect certain details of your access to and use of the App, including traffic data, location data, logs and other communication data and the resources that you access and use on or through the App.

DEVICE INFORMATION.

We may collect information about your mobile device and an internet connection, including the device's unique identifies, IP address, operating system, browser type, mobile network information and the device's telephone number.

STORED INFORMATION AND FILES.

The App may also access metadata and other information associated with other files stored on your device. This may include, for example, device logs or device usage metadata information.

LOCATION INFORMATION.

The App collects coarse real-time information about the location of your device and its IP address while the App is in use. The App will collect and store a user's location info through several different analytics tools. FDC will not share a user's location information with third parties, and will instead use the location information we collect to provide more relevant data to the user and to generally enhance our understanding of our user base.

INFORMATION COLLECTION TECHNOLOGIES

The technologies we use for automatic information collection may include:

COOKIES (OR MOBILE COOKIES).

A cookie is a small file placed on your mobile device. It may be possible to refuse to accept mobile cookies by activating the appropriate setting on your mobile device. However, if you select this setting you may be unable to access certain parts of the App.

WEB BEACONS.

Pages of the App and our emails may contain small electronic files known as web beacons (also referred to as clear gifs, pixel tags, and single-pixel gifs) that may permit FDC, for example, to count users who have visited those pages or opened an email and for other related App statistics, as well as recording the popularity of certain App content and verifying system and server integrity.

THIRD-PARTY INFORMATION COLLECTION

When you use the App or its content, certain third parties may use automatic information collection technologies to collect information about you or your device. These third parties may include:

App store and platform providers; Analytics Companies

These third parties may use tracking technologies to collect information about you when you use the App, including tools like Mixpanel, Google Analytics, SegmentIO, Bugsnag, Instabug, Firebase, LiveChat, Facebook SDK and OneSignal. The information they collect may include analytics information, device information and location information, as well as your email address.

We do not control these third parties' tracking technologies or how they may be used. If you have any questions, you should contact the responsible provider directly.

HOW WE USE YOUR INFORMATION

We use information that we collect about you or that you provide to us, including any personal information, to:

Provide you with the App and its contents and any other information that you request from us.

Facilitate your activities with respect to the App

Contact you regarding administrative issues, such as questions about a specific request or otherwise respond to your comments or requests.

Prevent, detect, mitigate and investigate fraud, security breaches, and potentially prohibited or illegal activities.

Help us operate the App.

Deliver notices regarding your account.

Comply with FIRS and local tax requirements and for tax reporting purposes.

Provide you with information, such as notices of investment opportunities via the App, or updates concerning investments that you have participated in.

Send you information we believe is relevant to you, such as news, bulletins, marketing materials or other information.

Enforce this Policy and the Terms and Conditions.

Conduct user surveys and questionnaires

Comply with applicable law.

We use aggregated information to analyze the effectiveness of the App, to improve the App, and for other similar purposes. In addition, from time to time, we may undertake or commission statistical and other summary analyses of the general behavior and characteristics of users participating in the App, and may share aggregated information with third parties. We may collect aggregated information through the features of the software that supports the App, through cookies, and through other means described in this Policy.

To enable us to better understand the characteristics of our users and/or to provide services tailored to your needs, we may combine your personal information with certain automatically-collected information that would not otherwise be personally identifiable. If we combine or link any automatically-collected, non-individually identifiable information with your personal information, the resulting combination will be treated as personal information under this Policy.

DISCLOSURE OF YOUR INFORMATION

We may disclose personal information that we collect or that you provide to our subsidiaries, which may use the personal information in a manner consistent with this Policy. We may disclose aggregated information about our users or information that does not identify any individuals or device, without restriction:

To our subsidiaries and affiliates, which may use the aggregated information we share in a manner consistent with this Policy.

To contractors, service providers and other third parties we use to support our business and who are bound by contractual obligations to keep such aggregated information confidential and use it only for the purposes for which we disclose it to them.

In the event of a transaction or proposed transaction involving the transfer of substantially all of the assets of FDC or one or more of its businesses to another entity, whether an affiliate or a third party, or in connection with a bankruptcy, we may share aggregated information in the diligence process or to otherwise facilitate the transaction, and with individuals assisting in the transaction or in connection with a bankruptcy. Any aggregated information may also be one of the transferred assets as part of the transaction or bankruptcy.

To the extent we reasonably believe we are required to do so by law or to comply with any legal or regulatory requirement or request, or to protect against fraud, illegal activity, to otherwise protect FDC from liability.

If we believe it is necessary or appropriate to protect the rights, property or safety of the App's users, any third party or FDC.

YOUR CHOICES ABOUT OUR COLLECTION, USE AND DISCLOSURE OF YOUR INFORMATION

We strive to provide you with the choices regarding the personal information you provide to us. This section describes mechanisms we provide for you to control certain uses and disclosures of your information.

TRACKING TECHNOLOGIES.

You can set your mobile device to refuse all or some mobile cookies, or to alert you when cookies are being sent by logging into the App and visiting your account profile page. If you disable or refuse cookies or block the use of other tracking technologies, some parts of the App may then be inaccessible or not function properly.

LOCATION INFORMATION.

You can choose whether or not to allow the App to collect and use real-time information about your device's location by logging into the App and visiting your account profile page. If you block the use of location information, some parts of the App may then be inaccessible or not function properly.

In general, you may browse the App without providing personal information. However, if you choose not to provide certain personal information through the App, we may not be able to provide certain services or process certain of your requests. You will not be able to become an investor or use all of the features that we offer through the App. Depending on the functionality associated with the App feature you are using, you may be able to update or delete certain of your personal information on the App. Accordingly, at your request, we will take reasonable steps to remove your personal information from our databases. However, please note that:

We may not be permitted to delete your personal information completely, due to FIRS and regulatory reporting requirements, investments on the App and the rights thereof, and data backups and records of deletions.

If you request deletion of your personal information, you may be unable to use certain features of the App.

Certain of your personal information may remain in our databases following the deletion of your account.

You may not remove de-identified, anonymous, or aggregate data from our databases.

Any deletion requests may be sent to info@fdc.ng.com

If you no longer wish to receive marketing emails from us, you can opt out of these communications by logging into the App and visiting your account profile page or by contacting us at info@fdc.ng.com. Please understand that you will not be allowed to opt-out of transactional notices or other legal and related notices concerning your relationship to the App or your account.

ACCESSING AND CORRECTING YOUR PERSONAL INFORMATION

You can review and change your personal information by logging into the App and visiting your account profile page. You may also send us an email at info@fdc.ng.com to request access to, correct or delete any personal information that you have provided to us. We cannot delete your personal information except by also deleting your user account. We may not accommodate a request to change information if we believe the change would violate any law or legal requirement or cause the information to be incorrect.

DATA SECURITY

We have put in place reasonable security systems designed to prevent unauthorized access to or disclosure of personal information, and we take reasonable steps to secure and safeguard this information against loss, theft, and unauthorized use, disclosure, or modification. With that said, there is no such thing as 100% security of the networks, servers and databases we operate or that are operated on our behalf. Before submitting any personal information via the App, please be aware of these inherent risks and understand that you do so at your own risk. You also play a role in protecting your personal information. Please do not share your user name or password with others. If we receive an order or instructions using your information we will consider that you have authorized the transaction.

DATA RETENTION

We keep your personal information for as long as reasonably necessary for the purposes described in this Policy, while we have a legitimate business need to do so in connection with your account, or as required by law (e.g. for tax, legal, accounting or other purposes), whichever is longer.

CHANGES TO THIS POLICY

We may update or modify this Policy at any time, which will become effective as of our posting on the App. In addition to posting on the App, we will notify you that this Policy has been changed through an in-App alert the first time you use the App after we make the change.

You are responsible for ensuring we have up-to-date contact information for you and for periodically visiting this Policy to check for any changes.

Contact Information

If you have any questions about this Policy, the practices of the App or your dealings with the App, please contact us at:

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