

PRIVACY POLICY FOR WEBSITE

Effective date: January 1, 2018

Applicable to: www.cowryasset.com

1. DEFINITIONS

"**Parties**" means both You and the operator of the Website: www.cowryasset.com.

"**Operator**" means the owner, publisher and administrator of the Website.

"**Personal Data**" means any personal information collected for You in relation with your use of this service which is capable of identifying You.

"**Service**" means the Website, which is known as: www.cowryasset.com including all pages, sub pages, all blogs, forums and other connected internet content whatsoever.

"**Services**" means the services offered on the Website.

"**You, Yours**" means the user of this Website.

2. INTRODUCTION

This Privacy Policy is designed to inform You about the Personal Data we collect, how we collect this data, the uses of the data, and Your rights relating to the Personal Data when You use this Service or purchase the Services offered on the Website.

We are committed to protecting your Personal Data while You use this Website.

By continuing to use our Website, You acknowledge that You have reviewed the Privacy Policy and agree to its terms. This also means that You have consented to the use of Your Personal Data and have accepted the applicable disclosures.

3. THE PERSONAL DATA WE COLLECT FROM YOU

We collect various information to enable us provide good Service to all our users. Depending on how our Service will be used, the different types of Personal Data we collect are as follows:

A. For registered users: During the process of Your registration we may collect the following information:

Name;
Gender;
Date of Birth;
Marital Status;
Phone Number;
National Identification Number(NIN);
E-mail Address;
Next of Kin Details;
Bank Details;

We may also require other information in relation to:

- (I) Your interaction with our representatives;
- (II) receiving notifications by text message or email about marketing;
- (III) receiving general emails from us.
- (IV) the purchases You make.

B. For unregistered users: We will collect passive information from all registered and unregistered users. These information include cookies, IP address information, location information and certain browser information.

C. Sales and billing information: We may collect Your credit and/or debit card information, which includes Your card number, password, etc, Your billing address, Your contact address and other information required for Your purchases.

D. User experience: From time to time we may also request certain Personal Data that may be necessary to improve our Service and the Services we offer for sale on the Website.

4. THE PERSONAL DATA WE COLLECT AS YOU USE OUR SERVICE

We use the following to collect Personal Data from You:

Cookies: We use the data collected by the cookies to offer You the best experience on our Website. Cookies are information stored on Your browser when You visit our Website or use a social network with Your PC, Smartphone or Tablets. They contain various data which includes the name of the server from which it comes, the numeric

identifier, etc. The types of cookies we use are as follows:

(I) **Technical cookies:** These cookies are essential for the correct functioning of our Website and they are required to provide the Service required to our users.

(II) **Profiling cookies:** These cookies are used to create user profiles based on personal choices and preferences in order to send advertising messages to Your device.

(III) **Support in configuring your browser:** You can manage these cookies through the settings of Your browser on Your device. However, deleting cookies from Your browser may remove the preferences You have set for this Website.

Log Data: We also use log files which store automatic information collected when users visit this Website. The log data which may be collected are as follows:

(I) the domain and host from which You access the Website;

(II) name of the Internet Service Provider (ISP);

(III) date and time of visit;

(IV) Your computer operating system and browser software;

(V) web pages visited, the duration, and frequency of visits;

(VI) Your Internet Protocol (IP) address.

5. THIRD PARTIES

We share Your Personal Data with third parties in order to protect our rights, properties, and safety and for the safety of users of this Website.

6. PURPOSE OF PROCESSING PERSONAL DATA

We collect and use Your Personal Data for the following reasons:

(I) to provide our Service and to maintain and make improvements to the Service we provide to You;

(II) to develop new Services on the Website;

(III) to provide personalized Service to You, including making recommendations and providing personalized content;

(IV) to provide You with updates on the Website and related items;

(V) to provide analytics to understand how our Service is used.

7. STORAGE OF PERSONAL DATA

We take the security of the Personal Data we collect very seriously, and we take reasonable measures to reduce the risk of accidental destruction, loss or unauthorized access to such information. However, please note that no system involving the transmission of information via electronic storage systems or the internet is completely secure.

We use the following systems to store Your information:

We use M-files which is a cloud storage solution to store personal data.

The Personal Data and any other information we have about You may be stored for such period as we may determine until You terminate Your account with us or You withdraw Your consent.

8. PROTECTION OF PERSONAL DATA

Our Service is built with strong security features that continuously protects Your Personal Data. Our security features help us detect and block security threats. If we detect any security risk, we may inform You and guide You through steps to stay protected.

9. DISCLOSURE OF PERSONAL DATA

We do not disclose Your Personal Data except for any of the following reasons:

(I) if You have granted us the permission to do so: We will disclose Your Personal Data where we have received Your unequivocal consent and permission to do so. However, such consent may be withdrawn at anytime;

(II) if we are required to do so by an existing law or regulation: We may also disclose and share Your Personal Data for the following reasons:

- to meet any applicable law, regulation, legal process, or any legal request, such as subpoenas, court orders, requests for administrative or government bodies;
- to enforce our applicable Terms of Use;

- to detect, prevent, or address any fraud, security or technical issues;
- to prosecute or bring any legal action against any user who has violated any law or our Terms of Use.

(III) For any other other reason that may be necessary for the operation of our Website.

10. LINKS TO THIRD PARTY SITES/SERVICES

The website may contain links to other websites which we believe may offer useful information. This linked websites are not under our control and this Privacy Policy does not apply to these websites. We suggest that You contact those websites directly for information on their privacy policy, security, data collection and distribution policies.

11. ACCESSING, MODIFYING AND DELETING YOUR PERSONAL DATA

If you wish to access, review, modify any information we have about You, You may do so by simply contacting us on the following email address: info@cowryasset.com. You may also request that we delete any information belonging to You that we have stored.

12. YOUR RIGHTS

Your rights in relation to Your Personal Data are as follows:

- (I) the right to have access to Your Personal Data;
- (II) the right to be informed about the processing of Your Personal Data;
- (III) the right to rectify any inaccurate Personal Data or any information about You;
- (IV) the right to review, modify or erase Your Personal Data and any other information we have about You;
- (V) the right to restrict the processing of Your Personal Data;
- (VI) the right to block Personal Data processing in violation of any law;
- (VII) the right to be informed about any rectification or erasure of Personal Data or restriction of any processing carried out;

(VIII) the right to the portability of Your Personal Data; and

(IX) the right to lodge a complaint to a supervisory authority within Nigeria.

13. CONTACT INFORMATION

If You have any questions regarding this Privacy Policy or the Personal Data we collect, or if You wish to make any comments or complaints about anything related to this Privacy Policy, please contact us at the following email address: complaints@cowryasset.com.

14. REVISIONS AND MODIFICATIONS

We reserve the right to modify and revise this Privacy Policy from time to time without Your explicit consent. If we make any fundamental change, we will notify You and obtain Your consent to the revised version.