

At Honor Global Markets, the privacy of our (potential) customers, service users and their personal data is of utmost importance to us. Pursuant to our resolution, we have developed this Privacy Policy to explain our privacy practices, in particular how we collect, process, retain, share and protect your personal data when you visit our websites, offices or use our digital platforms (collectively, the “Platforms” or “Services”), and your rights as a data subject.

This Privacy Policy is entered into by and between Honor Global Markets (the “Company”) and you and constitutes our commitment to protecting user privacy and complying with relevant data protection laws on all platforms. It is intended to provide information about our privacy practices and help you understand how we process your data in full compliance with the provisions of the Nigerian Data Protection Act, 2023 and other applicable data protection regulations.

1. Legal basis for processing your data

Depending on the context of our interaction with you, the legal basis for processing your personal data may be one of the following:

- ① For the performance of a contract we have or are about to enter into with you;
- ② Based on your consent; or
- ③ For our or a third party’ s legitimate business interests.

2. Consent

When you visit our platform, accept our cookie policy, and in particular, when you use the services provided on our website and digital platform, visit any of our offices and submit your data for official or unofficial purposes, you consent to our processing of your personal data.

3. What personal data do we collect?

When you use the services provided on our website and digital platform, we collect your personal data, including the following:

- ① Registration information: When you register to use the services provided on our digital platform, we will collect personal data as needed to provide and provide the services you requested. Depending on the service you choose, in order to meet regulatory requirements for Know Your Customer (KYC) purposes, we may ask you to provide your name, age, mother’s maiden name, gender, birthday, facial photo, residential address, ID information (photo, number), utility bill, email address, mobile phone number, social media account and debit/credit card details to create an account. We will also ask you to provide your National Identification Number (NIN) and/or Bank Verification Number (BVN) in accordance with regulations to facilitate our KYC calculation process. We may also ask you to provide other necessary personal details when you use our services.
- ② Transaction Information: When you use our digital platform to send and receive money, shop from merchants, pay bills, deposit and withdraw cash, we collect transaction information and other relevant information required to provide and perform our obligations (such as transaction receipts, account statements), such as: the amount sent or received, the amount paid for products or services, merchant information - including your device and geolocation information.
- ③ Participant Personal Data: When you use our services, we may collect personal data of other participants related to the transaction with your consent, such as your phone contacts so that you can easily trade with friends and contacts and enable instant messaging (IM). When you send

or receive funds through the service, we collect personal data such as the name and financial account information of the participant receiving (or sending) the funds.

④ Image Information: We may collect your image (upload, store and use) information to support account opening, such as uploading your portrait. We may also collect information from your image when you use our customer support to upload evidence such as statements and checks. In addition, we may collect your image information for regulatory KYC purposes. Our CCTV cameras may also process your image when you visit any of our offices.

⑤ Information from other sources: When you complain to us about our services, we may collect information from other sources, such as our social media platforms. However, we will only ask for information relevant to the help you need. In addition, we also collect information indirectly from the Nigeria Interbank Settlement System (NIBSS), credit bureaus, the National Identity Management Commission (NIMC) or other third-party KYC verification service providers.

⑥ Other information related to your use of our website or services: When you communicate with us, contact our customer support team, respond to surveys, or use features provided by third-party service providers through our platform, we may collect other information from you.

⑦ We do not collect information from minors: If you are under 18 years of age, you are not eligible to use the services provided on our digital platform.

4. How do we retain personal data?

We retain personal data in an identifiable format only for as long as necessary to achieve business purposes (in particular, to provide you with services) and to fulfill legal or regulatory obligations. Subject to applicable law (which may require us to retain your personal data for a certain period of time from time to time), we will retain your personal data for as long as necessary to achieve the purpose for which we collected the data, including for the purpose of satisfying any legal, accounting or reporting obligations.

5. How do we process personal data?

We collect your personal data to provide you with an efficient and secure customer experience.

We may process your personal data for the following reasons:

① Initiate payments, send or receive money, pay bills;

② Verify your access to your account;

③ Communicate with you about your account status;

④ Manage risk, fraud and abuse of our services and protect you from fraud (by developing and adopting measures to verify your identity). Our risk and fraud tools use personal data, device information and geolocation from the platforms where we provide services to help detect and prevent fraud and abuse of services.

⑤ Comply with our legal and regulatory obligations and enforce the terms of our website and services, including compliance with all applicable laws and regulations.

⑥ Track and track information (data) leaks and repair identified leaks.

⑦ Resolve disputes and troubleshoot.

6. Sharing your personal data

We may share your personal data or other information about you with others for the following reasons:

① Share with other entities within the Honor Global Markets group that are subject to the same level of internal control: We may share your personal data with other entities within the

Honor Global Markets group as needed to implement the technical services you request, manage risks through risk model systems, prevent potential illegal and fraudulent behavior and violations of our policies and agreements, and help us manage the connectivity of our services.

② Share with other companies that provide services to us: We may share personal data with third-party service providers who perform services and functions on our behalf and in accordance with our instructions. These third-party service providers may, for example, provide you with services, verify your identity, assist in processing transactions, send you advertisements for our products and services, or provide customer support. Please rest assured that we will ensure that these companies take compliant and legal measures to ensure the security and confidentiality of your personal data.

③ Share with non-affiliated third-party service providers who provide functions through our platform to help complete the services you request, with your prior consent.

④ Share with other financial institutions: We may share personal data with other financial institutions that we work with to provide services related to Honor Global Markets only, unless your consent extends to other purposes. We may also share personal data to process transactions and keep your financial information up to date.

⑤ Shared with other parties to transactions when you use the Services, such as other users and their service providers. This includes other users and their service providers to whom you send or receive funds.

⑥ Where permitted or required by law: We may share information about you with other parties for Honor Global Markets' business purposes or where permitted or required by law,

7. How do we use cookies?

Cookies are small files placed on your device's browser that enable the website to recognize your device as you browse different pages. Like most interactive websites, our website uses cookies to track your activities during a session. Our website uses only encrypted session cookies, which are deleted after a predefined timeout period or when the user exits the platform and closes the browser. Session cookies do not collect information from your device. They typically store data in the form of session identifiers and do not identify you personally. Some aspects of our website are only available through the use of cookies, so if you choose to disable or reject cookies, your use of our website may be limited or unavailable. You can also choose to accept, reject or manage cookie settings, which affects how you interact with our website and determines the functionality of the page.

8. What rights do you have?

1. Access request: Under the law and applicable data protection regulations, you have the right to ask us whether we hold any personal data about you, and if so, to request a copy of that personal data in electronic form, unless you wish to receive it in another way (such as a paper copy). In addition, you can ask us to provide information about how we use your personal data, who we share it with, how long we retain it, where it is stored, and other information that will help you understand how we use the data.

2. Correction request: If your personal data is inaccurate, outdated or incomplete, you have the right to ask us to correct it (including by providing a supplementary statement).

3. Deletion request: If:

① Your personal data is no longer necessary for the purpose of collection;

② Your personal data is processed unlawfully;

- ③ Your personal data must be deleted in order to comply with the law or court order;
- ④ You withdraw your consent to the processing of personal data (and if this is the only basis for our processing of your personal data);
- ⑤ You object to the holding of the data, provided that there are no overriding legitimate grounds for continued processing; or
- ⑥ You object to processing for direct marketing purposes.
- ⑦ If we receive your request for deletion, we will also take reasonable steps to notify other data controllers that process the data so that they can seek to delete links or copies of your personal data. We may deny your request to delete your personal data if the processing of your personal data is necessary for the following circumstances:
 - ⑧ Exercise our right to freedom of expression and information;
 - ⑨ Comply with relevant Nigerian laws and regulations;
 - ⑩ Perform tasks in the public interest or exercise certain official powers vested in us;
 - ⑪ Establish, exercise or defend legal claims;
 - ⑫ Comply with relevant laws and regulatory instructions.
- ⑬ In these cases, we may restrict processing rather than delete your personal data if you request.

9. How do we protect your personal data?

- ① **Security:** We maintain technical, physical and administrative security measures designed to provide reasonable protection for your personal data from loss, misuse, unauthorized access, disclosure and alteration. Security measures include firewalls, data encryption, physical access control to our office premises, CCTV cameras for public safety and quality control, and information access authorization control.
- ② **Confidentiality:** Your personal data is considered confidential and will not be disclosed to any third party except under legal and/or regulatory conditions. If you make a request under the Freedom of Information Act and other relevant regulations, you have the right to view and obtain a copy of any and all information we hold about you.
- ③ While we are committed to protecting our systems and services and safeguarding the information entrusted to us, your role in fulfilling your confidentiality obligations includes, but is not limited to, taking and implementing appropriate security measures, such as protecting and maintaining the privacy of your password and account/profile registration information, complying with the physical security protocols of our office premises, and verifying that the personal data we hold about you is accurate and up-to-date.