



PRIVACY NOTICE

Introduction

Personal Information is as important to us as it is to you, At FSDH Asset Management Limited (“FSDH”), we are committed to protecting your information. By ‘your information’, we mean any information provided to us by you or a third party. We will only process where we have obtained your explicit consent or are otherwise lawfully permitted to do so.

This Privacy Policy explains what information we (Data controller) collect, how we collect, share, use, and protect your personal information in connection with our Business.

Security of personal information

Safeguarding your personal information is our main concern. We maintain physical, electronic and procedural safeguards that comply with applicable federal laws to secure your information from unauthorized access and use, accidental or unlawful alteration and destruction; and other unlawful or unauthorized forms of processing. We engage in the continuous training of our employees in the proper management of personal information. When we use other companies to provide services, we require them to protect the confidentiality of personal information they receive.

At FSDH, we take data privacy very seriously and we provide our customers with all necessary data security to protect such personal information from unauthorized access. We require any third parties who carry out any work on our behalf to comply with appropriate compliance standards to protect your information. We are pleased to announce that we comply with global best practices and requirements of the Nigeria Data Protection Regulation (NDPR) and the European General Data Protection Regulation (GDPR). As an FSDH customer, be assured that we will keep protecting your information as we have always done.

The information we collect

FSDH will only collect your information in line with relevant regulations and laws.

How do we collect information?

We may collect information from a range of sources, and it may relate to any of the products or services we currently provide or may have provided in the past.

We collect your personal information when...

- you open an account or perform transactions such as make deposits or withdrawals from your account, payment history and transactions records
- you seek advice about your investments

- you seek information concerning complaints and disputes
- you provide account information such as your personal details e.g. name, gender, date and place of birth; contact information such as address, email address, and mobile numbers, provide your employment information
- you provide information concerning your identity e.g. photo ID, passport information, National ID card and nationality
- you use your login credentials for online and mobile apps
- we conduct necessary investigations i.e., due diligence checks, and AML/CFT checks and obtain information that we need to support our regulatory obligations, e.g. information about transaction details, detection of any suspicious and unusual activities.

Note that we may collect information about your computer (or mobile device), including where available your IP address, operating system and browser type, for system administration or for our own commercial purposes. This is statistical data about our users' browsing actions and patterns and does not identify any individual.

How we use your information

- FSDH will only use your information when you have provided your consent or when the company is required by the law to do so.
- We use the information we collect to provide customers with excellent products and services, to manage our business and to offer an enriched and enhanced customer experience.
- We make appropriate use of your data to manage transactions, respond to your requests, and to provide you with more relevant products and services.
- We use your information to deliver our products and services, carry out your instructions, and provide online product and services.
- We use this information to detect and prevent financial crimes including fraud, financing for terrorism and money laundering, this is to ensure security and business continuity.
- We will use your information to meet our compliance obligations, to comply with laws and regulations and to share with regulators when necessary.
- We may also use personal information we have about you such as your email address to deliver advertising to you directly or on our websites, provide updates on special deals and offers that might interest you (unless you tell us otherwise).

- We may send you general announcements or important news about your account, request your feedback and we believe you should be able to select what kinds of information you receive from us via email.
- We may need to record conversations you have with us including phone calls, face-to-face meetings, letters, emails and any other kinds of communication. These recordings may be used to check your instructions to us and improve on our product and service delivery.

Who we share your information with

The company, in efforts to provide you with excellent products and services may need to outsource its product delivery, this will be done in line with relevant regulations and laws. We may share your information in order to provide you with products or services you've requested.

We may also share your information where we have a public or legal duty to do so, when we need it to conclude regulatory reporting and when we have requested and received your permission to share it.

Individual rights

- **The right to be informed**

To emphasize the need for transparency over the usage of personal data, we ensure fair processing of information typically through this privacy policy.

- **The rights to access**

Individuals have the right to access information the Company holds, access their personal data and other supplementary information and obtain information about how we process it.

- **The right to restrict processing**

Individuals have a right to 'block' or withdraw their consent to our processing of your information, which you can do at any time. When processing is restricted, we are permitted to store the personal data, but not further process it.

- **The right to rectification**

Individuals are entitled to have personal data rectified if it is inaccurate or incomplete. If this personal data in question has been disclosed to third parties, they must be informed of the rectification where possible. The Company must also inform the individuals about the third parties to whom the data has been disclosed where appropriate.

- **The right to erasure**

Individuals have the right to request the deletion or removal of personal data where there is no compelling legal or regulatory requirement for its continued processing. The Company will make sure that this right is protected.

- **The right to data portability**

We will ensure that personal data is moved, copied or transferred easily from one IT environment to another in a safe and secure way, without hindrance to usability.

- **The right to automated decision making and profiling**

Individuals have the right to query a decision/profiling that we make/do about a product or service that they have applied for and that was made solely by automated means.

- **The right to object**

Individuals have the right to object to our processing of their information in some circumstances.

Individual Responsibility

Individuals are responsible for making sure the information provided to the Company is accurate and should inform the Company on any changes as it occurs, this will enable us to update your information with us.

Cookies

A cookie is a small file that is placed on your computer's hard drive. Its functions include storing your login and session statuses, recording your user preferences and analyzing web traffic.

Cookies enable websites and applications to store your user preferences in order to enhance your overall website experience by better understanding your preferences, likes and dislikes. They also allow websites to identify when users are logged on their site and when they return to their site, test new content and analyze web traffic with data analytics.

Besides the data you elect to disclose and share with us, we cannot access your computer or any other information about you with cookies.

Although most browsers automatically accept cookies, you can amend your browser settings to disable cookies. This may however prevent you from fully experiencing the website as it was intended.

Policy Update

We may update our privacy notice from time to time. When we do, we will communicate the changes to you.

If you have any queries or complaints about this Privacy Policy, please contact us **at UAC Building, 1/5 Odunlami Street, Lagos** and our contact details can be accessed on our official website; www.fsdhaml.com. You can escalate to National Information Technology Development Agency (NITDA) via an email address: info@nitda.gov.ng or website: nitda.gov.ng

Declaration

I have read, understood and agree with the cookie and privacy policy of FSDH Asset Management Limited.

Signature:

Date (dd/mm/yyyy):

INDIVIDUAL TAX RESIDENCY SELF-CERTIFICATION FORM INSTRUCTIONS (COMMON REPORTING STANDARD – INDIVIDUAL)



Please read these instructions before completing the form.

The Federal Inland Revenue (FIRS) “Regulations based on the OECD Common Reporting Standard (“CRS”)” requires FSDH Asset Management to collect and report certain information about an account holder’s tax residence. Each jurisdiction has its own rules for defining tax residence, and jurisdictions have provided information on how to determine if you are resident.

If the account holder’s tax residence is located outside Nigeria, FSDH Asset Management may be legally obliged to pass on the information in this form and other financial information with respect to your financial accounts to Federal Inland Revenue (FIRS)) and they may exchange this information with tax authorities of another jurisdiction or jurisdictions pursuant to intergovernmental agreements to exchange financial account information.

Please note:

- For joint or multiple account holders, use a separate form for each individual person.
- Where you need to self-certify on behalf of an entity account holder, do not use this form. Instead, you will need an “Entity tax residency self-certification.” Similarly, if you are a controlling person of an entity, please fill in a “Controlling person tax residency self-certification form” instead of this form.
- If you are filling in this form on behalf of someone else, kindly state in what capacity you are signing in Part 3. For example, you may be the custodian or nominee of an account on behalf of the account holder, or you may be completing the form under a power of attorney.
- A legal guardian should complete the form on behalf of an account holder who is a minor.

INDIVIDUAL TAX RESIDENCY SELF-CERTIFICATION FORM *-(Please complete parts 1-3 IN BLOCK CAPITALS)*

A. PART 1 – IDENTIFICATION OF INDIVIDUAL ACCOUNT HOLDER

NAME OF ACCOUNT
HOLDER:.....
FAMILY NAME OR SURNAME(S): *.....
TITLE:
FIRST OR GIVEN NAME: *.....

B. CURRENT RESIDENCE ADDRESS*:

HOUSE NUMBER..... STREET NAME
.....
TOWN/CITY..... LGA:
STATE OF RESIDENCEPOSTAL CODE/ZIP CODE (IF ANY):.....
COUNTRY:.....

PHONE NUMBER(S)*

C. MAILING ADDRESS: (PLEASE ONLY COMPLETE IF DIFFERENT TO THE ADDRESS SHOWN IN SECTION B)

HOUSE NUMBER..... STREET NAME
.....
TOWN/CITY..... LGA:
STATE OF RESIDENCEPOSTAL CODE/ZIP CODE (IF ANY):.....
COUNTRY:.....

D. DATE OF BIRTH* (DD/MM/YYYY)

E. PLACE OF BIRTH

TOWN OR CITY OF BIRTH *.....
COUNTRY OF BIRTH*

PART 2 – COUNTRY/JURISDICTION OF RESIDENCE FOR TAX PURPOSES AND RELATED TAXPAYER IDENTIFICATION NUMBER OR EQUIVALENT NUMBER* (“TIN”) (SEE APPENDIX)

Please complete the following table indicating (i) where the Account Holder is tax resident and (ii) the Account Holder’s TIN for each country/jurisdiction indicated.

If the Account Holder is tax resident in more than three countries/jurisdictions, please use a separate sheet

If a TIN is unavailable please provide the appropriate reason **A, B or C where indicated below:**

Reason A - The country/jurisdiction where the Account Holder is resident does not issue TINs to its residents

Reason B - The Account Holder is otherwise unable to obtain a TIN or equivalent number(Please explain why you are unable to obtain a TIN in the below table if you have selected this reason)

Reason C - No TIN is required. (Note. Only select this reason if the domestic law of the relevant jurisdiction does not require the collection of the TIN issued by such jurisdiction)

Country/Jurisdiction of tax residence	TIN or its equivalent in your country e.g National Insurance Number	If no TIN is available enter Reason A, B or C
1		
2		
3		

Please explain in the following boxes why you are unable to obtain a TIN if you selected Reason B above

1	
2	
3	

PART 3 – DECLARATIONS AND SIGNATURE*

I understand that the information supplied by me is covered by the full provisions of the terms and conditions governing the Account Holder’s relationship with FSDH Asset Management setting out how FSDH Asset Management may use and share the information supplied by me.

I acknowledge that the information contained in this form and information regarding the Account Holder and any Reportable Account(s) may be provided to the tax authorities of the country/jurisdiction in which this account(s) is/are maintained and exchanged with tax authorities of another country/jurisdiction or countries/jurisdictions in which the Account Holder may be tax resident pursuant to intergovernmental agreements to exchange financial account information.

I certify that I am the Account Holder (or am authorised to sign for the Account Holder) of all the account(s) to which this form relates.

I declare that all statements made in this declaration are, to the best of my knowledge and belief, correct and complete.

I undertake to advise FSDH Asset Management within 30 days of any change in circumstances which affects the tax residency status of the individual identified in Part 1 of this form or causes the information contained herein to become incorrect or incomplete, and to provide FSDH Asset Management with a suitably updated self-certification and Declaration within up to 30 days of such change in circumstances.

SIGNATURE: * _____

PRINT NAME: * _____

DATE:* _____

NOTE: If you are not the Account Holder please indicate the capacity in which you are signing the form. If signing under a power of attorney please also attach a certified copy of the power of attorney.

CAPACITY: * _____

Appendix – Summary Descriptions of Select Defined Terms

Note: These are selected summaries of defined terms provided to assist you with the completion of this form.

If you have any questions then please contact your tax adviser or domestic tax authority

“Account Holder” The term “Account Holder” means the person listed or identified as the holder of a Financial Account. A person, other than a Financial Institution, holding a Financial Account for the benefit of another person as an agent, a custodian, a nominee, a signatory, an investment advisor, an intermediary, or as a legal guardian, is not treated as the Account Holder

“Controlling Person” This is a natural person who exercises control over an entity. Where an entity Account Holder is treated as a Passive Non-Financial Entity (“NFE”) then a Financial Institution must determine whether such Controlling Persons are Reportable Persons. This definition corresponds to the term “beneficial owner” as described in Recommendation 10 and the Interpretative Note on Recommendation 10 of the Financial Action Task Force Recommendations.

If the account is maintained for an entity of which the individual is a Controlling Person, then the *“Controlling Person tax residency self-certification”* form should be completed instead of this form.

“Entity” The term “Entity” means a legal person or a legal arrangement, such as a corporation, organisation, partnership, trust or foundation

“Financial Account” A Financial Account is an account maintained by a Financial Institution and includes: Depository Accounts; Custodial Accounts; Equity and debt interest in certain Investment Entities; Cash Value Insurance Contracts; and Annuity Contracts

“Reportable Account” The term **“Reportable Account”** means an account held by one or more Reportable Persons or by a Passive NFE with one or more Controlling Persons that is a Reportable Person

“Reportable Jurisdiction” A Reportable Jurisdiction is a jurisdiction with which an obligation to provide financial account information is in place and that is identified in a published list.

“Reportable Person” A Reportable Person is defined as an individual who is tax resident in a Reportable Jurisdiction under the tax laws of that jurisdiction. Dual resident individuals may rely on

the tiebreaker rules contained in tax conventions (if applicable) to solve cases of double residence for purposes of determining their residence for tax purposes.

“TIN” (including “functional equivalent”)

The term “TIN” means Taxpayer Identification Number or a functional equivalent in the absence of a TIN. A TIN is a unique combination of letters or numbers assigned by a jurisdiction to an individual or an Entity and used to identify the individual or Entity for the purposes of administering the tax laws of such jurisdiction

Some jurisdictions do not issue a TIN. However, these jurisdictions often utilise some other high integrity number with an equivalent level of identification (a “functional equivalent”). Examples of that type of number include, for individuals, a social security/insurance number, citizen/personal identification/service code/number, and resident registration number.