

Privacy Policy

This Privacy Policy describes how C-One Ventures Platform Limited (“we”, “us”, “our” or “Company”) collects, uses, discloses, and protects the Personal Data of users (“you” or “your”) who access and use Fulcrum, our digital supply chain finance platform.

We are committed to protecting your privacy and ensuring the security of your Personal Data. Please read this Privacy Policy carefully to understand our practices regarding your Personal Data.

We use your Personal data to provide and improve the Service. By using the Service, you agree to the collection and use of your information in accordance with this Privacy Policy.

Interpretation and Definitions

Interpretation

The following definitions shall have the meaning stated below regardless of whether they appear in singular or in plural.

Definitions

For the purposes of this Privacy Policy:

Account means a unique account created for You to access our Service or parts of our Service.

Affiliate means an entity that controls, is controlled by or is under common control with a party, where “control” means ownership of 50% or more of the shares, equity interest or other securities entitled to vote for election of directors or other managing authority.

Company means C-One Ventures Platform Limited.

Cookies means small files that are placed on Your computer, mobile device or any other device by a website, containing the details of Your browsing history on that website among its many uses.

Country means the Federal Republic of Nigeria

Device means any device that can access the Service such as a computer, a cellphone or a digital tablet.

Personal Data is any information that relates to an identified or identifiable individual.

Platform means the Fulcrum Platform

Service means Trade receivable financing service offered on the Fulcrum Platform.

Service Provider means any natural or legal person who processes the data on behalf of the Company. It refers to third-party companies or individuals employed by the Company to facilitate the Service, to provide the Service on behalf of the Company, to perform services related to the Service or to assist the Company in analyzing how the Service is used.

Usage Data refers to data collected automatically, either generated by the use of the Service or from the Service infrastructure itself (for example, the duration of a page visit).

Website refers to Fulcrum, accessible from fulcrumng.com or www.fulcrumng.com

You mean the individual accessing or using the Service, or the company, or other legal entity on behalf of which such individual is accessing or using the Service, as applicable.

Information We collect

Personal Data

We may collect the following types of information from you:

- **Contact Information:** Such as your name, email address, phone number, and postal address.
- **Financial Information:** such as bank account details, audited financial statements or other financial information necessary for risk assessment and fund transfer purposes.
- **Professional Information:** such as your company name, job title, and professional background.
- **Transaction Information:** Information related to your transactions on the platform, including approved supplier invoices and transaction history.
- **User Credentials:** such as usernames and passwords used to access our platform.
- **Communication Information:** Information You provide when communicating with us or other users, such as support requests or inquiries.
- **Other Information:** We may also collect and process specific categories of information for specific and limited purposes, including but not limited to Information that will aid us in detecting and preventing financial crime, making our services available to you or knowing your marketing preferences to help us share with you information about relevant services, products and offers that we think may be of interest to you.

Automatically Collected Information/Usage Data

When you use or access our platform, we may automatically collect certain information, including:

- **Device Information:** such as Your IP address, browser type, operating system, and device identifiers.
- **Log Information:** such as the pages You visit, the time and date of access, and the duration of Your visit.
- **Cookies and Similar Technologies:** we may use cookies or similar technologies to enhance Your experience and collect information about your usage patterns. Cookies are files with small amount of data which may include an anonymous unique identifier. Cookies are sent to your browser from a website and stored on your device. Tracking technologies also used are beacons, tags, and scripts to collect and track information and to improve and analyse our Service. You can

instruct your browser to refuse all cookies or to indicate when a cookie is being sent. If you do not accept cookies on your browser, our online service experience to you may be degraded and you may not be able to use some portions of our Service.

Use of Your Personal Data

We may use Personal Data for the following purposes:

- To verify Your identity, authenticate your account, and provide access to the platform.
- To manage Your Account: to manage Your registration as a user of the Service. The Personal Data You provide can give You access to different functionalities of the Service that are available to You as a registered user.
- To facilitate and process transactions between buyers, sellers, and funders on our platform.
- To contact You: To contact You by email, telephone calls, SMS, or other equivalent forms of electronic communication, such as a mobile application's push notifications regarding updates or informative communications related to the functionalities, products or contracted services, including the security updates, when necessary or reasonable for their implementation.
- To understand your needs and provide You with news, special offers and general information about other goods, services and events which we offer that are similar to those that you have already purchased or enquired about unless You have opted not to receive such information.
- To manage Your requests: To attend and manage Your requests to Us.
- To improve and personalize our platform, services and user experience.
- To enforce our terms of service, policies, and legal obligations.
- To detect and Prevent crime, fraud, money laundering or terrorism financing activities
- For other purposes: We may use Your information for other purposes, such as data analysis, identifying usage trends, determining the effectiveness of our promotional campaigns and to evaluate and improve our Service, products, services, marketing and your experience.
- For other purposes required by law or regulation.

We may share Your personal information in the following situations:

- With Service Providers: We may share Your personal information with Service Providers to monitor and analyze the use of our Service, to contact You.
- For business transfers: We may share or transfer Your personal information in connection with, or during negotiations of, any merger, sale of Company assets, financing, or acquisition of all or a portion of Our business to another company.
- With Affiliates: We may share Your information with Our affiliates, in which case we will require those affiliates to honor this Privacy Policy. Affiliates include Our parent company and any other subsidiaries, joint venture partners or other companies that We control or that are under common control with Us.
- With business partners: We may share Your information with Our business partners to offer You certain products, services or promotions.

- With our Professional Advisers, Auditors/Legal Advisers, Correspondent Banks,
- With Regulatory Authorities: To comply with legal obligations, such as responding to lawful requests from public authorities.
- With Your consent: We may disclose Your personal information for any other purpose with Your consent.

Retention of Your Personal Data

We will retain Your Personal Data only for as long as is necessary for the purposes set out in this Privacy Policy. We will retain and use Your Personal Data to the extent necessary to comply with our legal obligations (for example, if we are required to retain your data to comply with applicable laws), resolve disputes, and enforce our legal agreements and policies.

We will also retain Usage Data for internal analysis purposes. Usage Data is generally retained for a shorter period of time, except when this data is used to strengthen the security or to improve the functionality of our Service, or we are legally obligated to retain this data for longer time periods.

Transfer of Your Personal Data

Your information, including Personal Data, is processed at the Company's operating offices and in any other place where the parties involved in the processing are located. This means that your information may be transferred to and maintained on computers located outside of your state, country or other governmental jurisdiction where the data protection laws may differ than those from your jurisdiction.

Your consent to this Privacy Policy followed by your submission of such information represents your agreement to that transfer.

We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Policy and no transfer of your Personal Data will take place to an organization or a country unless there are adequate controls in place including the security of your data and other personal information.

Delete Your Personal Data

You have the right to delete or request that we assist in deleting the Personal Data that we have collected about you.

Our Service may give you the ability to delete certain information about you from within the Service.

You may update, amend, or delete your information at any time by signing into your Account, if you have one, and visiting the account settings section that allows you to manage your personal information. You may also contact us to request access to, correct, or delete any personal information that you have provided to us.

Please note, however, that we may need to retain certain information when we have a legal obligation or lawful basis to do so.

Disclosure of Your Personal Data

Business Transactions

If the Company is involved in a merger, acquisition or asset sale, your Personal Data may be transferred. We will provide notice before your Personal Data is transferred and becomes subject to a different Privacy Policy.

Law enforcement

Under certain circumstances, we may be required to disclose your Personal Data if required to do so by law or in response to valid requests by public authorities (e.g. a court or a government agency).

Other legal requirements

The Company may disclose Your Personal Data in the good faith belief that such action is necessary to:

- Comply with a legal obligation
- Protect and defend the rights or property of the Company
- Prevent or investigate possible wrongdoing in connection with the Service
- Protect the personal safety of Users of the Service or the public
- Protect against legal liability

Security of Your Personal Data

The security of your Personal Data is important to us and we guarantee you that we implement reasonable security measures to protect your personal information against unauthorized access, alteration, disclosure, or destruction. However, no method of transmission over the Internet, or method of electronic storage is 100% secure. While we strive to use commercially acceptable means to protect your Personal Data, we cannot guarantee its absolute security.

You are responsible for securing and maintaining the privacy of your password and Account/profile registration information and verifying that the Personal Data we maintain about you is valid, accurate and up to date. If we receive instructions using your account login information, we will consider that you have authorised the instructions and process your instruction accordingly and without incurring any liability for doing so.

Your Rights

You have certain rights in relation to the personal data we collect as provided by the Nigeria Data Protection Regulation 2019 (NDPR), these rights include:

- A right to access your personal data
- A right to rectify/update your information in our possession
- A right to request the erasure of personal data
- A right to withdraw your consent to processing of personal data. This will however not affect the legality of processing carried out prior to any such withdrawal.
- Right to object to processing of personal data. This will only be applicable where there are no legal or operational reasons authorizing us to process your data.

- Request that your personal data be made available to you in a common electronic format and/or request that such data be sent to a third party.
- Request that your information be erased. We might continue to retain such data if there are valid legal, regulatory or operational reasons to do so.

These rights are however subject to certain limitations as provided in the Nigeria Data Protection Act (NDPA).

Children's Privacy

We do not knowingly collect personally identifiable information from anyone under the age of 13. If you are a parent or guardian and you are aware that your child has provided us with Personal Data, please contact us. If we become aware that we have collected Personal Data from anyone under the age of 13 without verification of parental consent, we shall take steps to remove that information from our servers.

If we need to rely on consent as a legal basis for processing your information and your country requires consent from a parent, we may require your parent's consent before we collect and use that information.

Links to Other Websites

Our Service may contain links to other websites that are not operated by us. If you click on a third-party link, you will be directed to that third party's site. We strongly advise you to review the Privacy Policy of every site you visit.

We have no control over and assume no responsibility for the content, privacy policies or practices of any third-party sites or services.

Information from locations outside Nigeria

If you are located outside Nigeria and choose to provide information to us, please note that the data, including Personal Data, will be processed in Nigeria. Your consent to this Privacy Policy followed by your submission of such information represents your agreement to that transfer.

Accuracy and update of your Information

You are responsible for making sure the information provided to us is accurate and you should inform us of any changes as it occurs, this will enable us update your information with us. Any changes to your information will affect only future uses of your Personal Information.

Changes to this Privacy Policy

We may update Our Privacy Policy from time to time. We will notify You of any changes by posting the new Privacy Policy on this page.

We will let You know via email and/or a prominent notice on Our Service, prior to the change becoming effective and update the "Last updated" date at the top of this Privacy Policy.

You are advised to review this Privacy Policy periodically for any changes. Changes to this Privacy Policy are effective when they are posted on this page.

Your continued use of the Services after we post any modifications to the Privacy Policy on our website will constitute your acknowledgment of the modifications and your consent to abide and be bound by the modified Privacy Policy.

Contact Us

We are committed to answering your questions or resolving your privacy complaints and concerns as quickly as possible. If you have any questions or concerns about this Privacy Policy, please contact us at support@fulcrumng.com.