

# Privacy Policy

## 1. Introduction

Bucksfield Asset Management (“Bucksfield” or “the Company”) is committed to protecting the privacy and security of your personal information. While providing services to you as an individual or corporate client, we may collect and process personal data. This Privacy Policy explains how we collect, use, store, and disclose your information when you interact with us through our website ([www.bucksfield.com.ng](http://www.bucksfield.com.ng)) and other service channels.

For the purpose of this Policy, Bucksfield Asset Management operates as a capital market operator within a Securities and Exchange Commission (SEC)-regulated environment.

By accessing or continuing to use our website or services, you acknowledge that you have read and understood this Privacy Policy and consent to the practices described herein. This Policy should be read alongside our Terms of Use.

## 2. Collection of Information

We collect personal information from a variety of sources, including when you interact with us directly or through third parties.

### a. Information You Provide

When you complete forms, applications, or communicate with us, we may collect:

- Full name (including aliases or usernames)
- Contact details (email address, phone number, mailing address)
- Identification details (passport data, national ID, identification numbers)
- Demographic information (date of birth, gender, nationality, state of origin, local government area)
- Employment and financial information (occupation, income, assets, financial statements)
- Biometric data (where required by law)

### b. Information from Interactions and Services

We may collect information through:

- Website usage and online forms
- Phone calls, emails, and in-person interactions
- Relationship managers and service representatives
- Transactional data (account balances, payment history, card usage)
- CCTV recordings within our premises

### c. Information from Third Parties

We may receive information from:

- Financial institutions, credit bureaus, and payment service providers

- Government agencies, regulators, and supervisory bodies
- Employers, legal representatives, or authorized third parties
- Public sources, including social media platforms you make publicly available

#### d. Sensitive Personal Data

We do not intentionally collect sensitive personal data (such as political opinions, religious beliefs, or health data) unless required by law. Where such data is necessary, your explicit consent will be obtained. If you voluntarily provide such data, you consent to its processing.

We may process information relating to criminal convictions where required for legal or regulatory compliance.

### 3. Cookies and Tracking Technologies

We use cookies and similar technologies to enhance your experience on our website. Cookies help us:

- Understand user preferences
- Improve website functionality
- Analyze site traffic

You may adjust your browser settings to decline cookies; however, this may affect your user experience.

### 4. How We Use Your Information

We process your personal data based on your consent, legal obligations, or our legitimate business interests. Your information may be used to:

- Establish and manage our relationship with you
- Verify your identity and assess applications
- Provide and improve our products and services
- Communicate updates, offers, and relevant information
- Maintain accurate records
- Detect, prevent, and investigate fraud, money laundering, and other illegal activities
- Comply with regulatory and legal obligations
- Assist law enforcement or regulatory authorities when required

We do **not** sell or trade your personal data to third parties.

### 5. Disclosure of Information

We may disclose your personal information only under the following circumstances:

- Where required by law, regulation, or court order
- To regulatory authorities or government agencies
- To protect our legal rights and interests
- Where disclosure is necessary in the public interest

## 6. Data Security

We implement appropriate technical and organizational safeguards to protect your personal data from unauthorized access, loss, misuse, or alteration. Access to personal data is restricted to authorized personnel only.

Where you are provided with login credentials (e.g., passwords or PINs), you are responsible for maintaining their confidentiality. Do not share your authentication details, including one-time passwords (OTPs), with anyone.

## 7. Data Retention

We retain your personal information only for as long as necessary to fulfill the purposes outlined in this Policy, or as required by legal, regulatory, or operational obligations.

## 8. Your Rights

Subject to applicable laws, you have the right to:

- Access your personal data
- Request correction of inaccurate or incomplete data
- Withdraw consent where processing is based on consent
- Object to or restrict processing of your data
- Request data portability in a structured electronic format
- Request deletion of your personal data (subject to legal limitations)

You may also lodge complaints or make inquiries regarding the processing of your personal data using the contact details below.

## 9. Social Media Platforms

Our interactions on social media platforms are subject to the privacy policies of those platforms. Please note that such platforms may process your data outside Nigeria and under different data protection laws.

We advise that you do not share sensitive financial or personal information via social media channels.

## 10. Marketing Communications

We may contact you with information about products or services that may interest you. You may opt out of receiving such communications at any time by contacting us.

## 11. Third-Party Websites

Our website may contain links to third-party websites. We are not responsible for the privacy practices of such websites and encourage you to review their privacy policies.

## 12. Changes to This Policy

We may update this Privacy Policy from time to time to reflect changes in our practices or legal requirements. Updates will be posted on this page, and the revised version will take effect immediately unless otherwise stated.

### 13. Contact Us

If you have any questions, concerns, or requests regarding this Privacy Policy or your personal data, please contact us:

- **Email:** [investment@bucksfield.com.ng](mailto:investment@bucksfield.com.ng)
- **Phone:** +234 (1) 02013301818

*This Privacy Policy is intended to align with applicable data protection regulations, including the Nigeria Data Protection Regulation (NDPR).*