Privacy Policy

We Value Your Privacy

At VAS2Nets Technologies Limited, we treat your personal information as private and confidential. We are dedicated to protecting your privacy and providing you with the highest level of security at any point of interaction with us. This Privacy Policy describes what personal information we collect, what we do with it and how we protect it.

This policy (together with our Terms and Conditions) sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it. By continuing to visit our website (www.vas2nets.com) and other VAS2Nets customer touchpoints, you accept and consent to the practices described in this policy.

Information We Collect and Use

- We collect information about you from a variety of sources, such as: website visits, applications, identification documents, curriculum vitae, interactions with relationship managers, and other third parties (payment gateways, and other financial institutions…) and other written or electronic communication reflecting information such as your name, address, passport details, identification numbers, biometric information, telephone number, occupation, assets and any other information we deem necessary.
- We may also use information received from third parties such as family, solicitors, friends or employers, website/ social media pages made public by you, government agencies, regulators, supervisory or credit agencies.
- We may also collect other information such as video footages of you whenever you step into any of our branches, telephone conversations when you call any of our contact centerlines, geographic information when you visit our websites from any country.

Non- Personal Information Collected by Us

In order to achieve our goal of providing you with the best service, we sometimes collect certain information during your visits to perform certain tasks such as grant you access to some parts of our web site or conduct research on your behavior on our site in order to improve our services. We will not disclose your information to any person outside our organization except as described in this Privacy Policy.

Protocol data

When you visit our website we collect the following personal data transmitted by your server:

- IP address
- Date and time of the request
- Time zone difference from Greenwich Mean Time (GMT)
- Content of the request (specific site)
- Access status / HTTP status code
- Volume of data transmitted each time
- Website from which the request comes
- Browser software, including language and version
- Operating system and its interface
- The country of origin for the visitor

Cookies

Cookies are small text files stored on your computer or mobile devices whenever you visit a website. Cookies have many uses, such as memorizing your preferences to tailor your experiences while on our site– or to help us analyze our website traffic.

VAS2Nets uses cookies to improve your experience while on this site. We would like to let you know a few things about our cookies:

- Some cookies are essential to access certain areas of this site;
- We use analytics cookies to help us understand how you use our site to discover what content is most useful to you

Use of Your Personal Information

The collection and use of personal data by VAS2Nets is guided by certain principles. These principles state that personal data should;

- Be processed fairly, lawfully and in a transparent manner.
- Be obtained for a specified and lawful purpose and shall not be processed in any manner incompatible with such purposes.
- Be adequate, relevant and limited to what is necessary to fulfil the purpose of processing.
- Be accurate and where necessary, up-to-date. In the event data is inaccurate, steps should be taken to rectify or erase such data.
- Not be kept for longer than necessary for the purpose of processing.
- Be processed in accordance with the data subject's rights
- Be kept safe from unauthorized processing, and accidental loss, damage or destruction using adequate technical and organizational measures.

Any personal information provided by you to VAS2Nets will be used with your consent, or under the following underlisted instances:

- Cases where processing of personal data is required for the fulfilment of a contractual obligation.
- Cases where processing of personal data is required for compliance with legal and/or regulatory requirements.
- Cases where processing is required to protect your vital interest or that of any other natural person.
- Cases where processing is required for an activity to be carried in significant public interest.
- Cases where processing is required for legitimate interests of VAS2Nets or a third party insofar as this does not conflict with the requirements for the protection of your personal data.

Your personal information is used in:

- Updating and enhancing VAS2Nets's records
- Executing your instructions.
- Establishing your identity and assessing applications for our products and services
- Pricing and designing our products and services
- Administering our products and services
- Managing our relationship with you
- Managing our risks
- Identifying and investigating illegal activity (i.e.), such as fraud
- Contacting you, for example in instances where we suspect fraud or some event(s) of significance.

- Conducting and improving our businesses and improving your experience with us.
- Preventing money laundering or terrorism financing activities.
- Complying with our legal obligations and assisting government and law enforcement agencies or regulators/supervisors
- Identifying and informing you about other products or services that we think may be of interest to you.
- Processing your job application if you apply for a job with us.

We may also collect, use and exchange your information in other ways permitted by law.

Automated Processing

We sometimes use automated systems and software to help us reach decisions about you, for example, to carry out security, fraud and money laundering checks, or to process your data when you apply for some of our products and services.

This type of processing is carried out under lawful basis and you can contact us to request that automated processing be reviewed by a human being if you detect any inaccuracies in your personal data.

Information We Share

We may share the information about you and your dealings with us, to the extent permitted by law, with the following:

- VAS2Nets's Branches
- Regulators/Supervisors, Government Agencies/courts - It may be necessary by law, legal process, litigation, and/or requests from public and governmental authorities within or outside your country of residence for VAS2Nets to disclose your personal information. We may also disclose information about you if we determine that for purposes of national security, law enforcement, or other issues of public importance, disclosure is necessary or appropriate.;
- External Auditors;
- VAS2Nets's staff;
- Correspondent banks;
- VAS2Nets's strategic partners/service providers – for the purpose of improving and providing our products and services to you. Your Personal information will not be shared with third parties for their marketing purposes.

We may also disclose information about you if we determine that disclosure is reasonably necessary to enforce our terms and conditions or protect our operations or users.

Information about our customers and their usage of our website is not shared with third parties for their marketing purposes. We do not disclose any information about any user's usage of our web site except in specific cases, and we do not share information with any unaffiliated third parties for marketing purposes unless you expressly give us permission to do so.

How We Protect Your Information

We take appropriate technical and organizational measures to prevent loss, unauthorized access, misuse, modification or disclosure of information under our control. This may include the use of encryption, access controls and other forms of security to ensure that your data is protected. We require all parties including our staff and third-parties processing data on our behalf to comply with relevant policies and guidelines to ensure confidentiality and that information is protected in use, when stored and during transmission. Our security controls and processes are also regularly updated to meet and exceed industry standards.

Where we have provided you (or where you have chosen) a password which grants you access to specific areas on our site, you are responsible for keeping this password confidential. We request that you do not to share your password or other authentication details (e.g. token generated codes) with anyone.

Where We Store Your Information

All Personal Information you provide to us is stored on our secure servers as well as secure physical locations and cloud infrastructure (where applicable). The data that we collect from you may be transferred to and stored at a destination outside Nigeria. Whenever your information is transferred to another location, we will take all necessary steps to ensure that your data is handled securely and in accordance with this privacy policy.

How Long We Store Your Information

We retain your data for as long as is necessary for the purpose(s) that it was collected. Storage of your data is also determined by legal, regulatory, administrative or operational requirements. We only retain information that allows us comply with legal and regulatory requests for certain data, meet business and audit requirements, respond to complaints and queries, or address disputes or claims that may arise.

Data that is not retained is securely destroyed when it is identified that is no longer needed for the purposes for which it was collected.

Your Rights

You have certain rights available to you, these include

- The right to access your personal information held by us. Your right of access can be exercised by sending an email to info@VAS2Nets.com
- The right to rectify inaccurate or incomplete information.
- Withdraw consent for processing in cases where consent has previously been given.
- Restrict or object to processing of your personal data. We might continue to process your data if there are valid legal or operational reasons You also have the right to:

- 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

Maintaining Accurate Information

Keeping your account information accurate and up to date is very important. You have access to your information, which includes your contact information through various means, such as our application portals.

If you discover any inaccuracies in your personal information, please promptly notify us, via our email, office or Contact Centre, and provide the required documentary evidence, to enable us to implement the necessary updates or changes.

Applicability of This Privacy Policy

VAS2Nets refers to VAS2Nets Technologies Limited

VAS2Nets Technologies Limited comprises of VAS2Nets branches worldwide.

Third-Party Sites and Services

VAS2Nets's websites, products, applications, and services may contain links to third-party websites, products and services. Our products and services may also use or offer products or services from third parties. Information collected by third parties, which may include such things as location data or contact details is governed by their

privacy practices and VAS2Nets will not be liable for any breach of confidentiality or privacy of your information on such sites. We encourage you to learn about the privacy practices of those third parties.

Social Media Platforms

VAS2Nets may interact with registered users of various social media platforms, including Facebook, Twitter, Google+, LinkedIn and Instagram. Please note that any content you post to such social media platforms (e.g. pictures, information or opinions), as well as any personal information that you otherwise make available to users (e.g. your profile) is subject to the applicable social media platform's terms of use and privacy policies. We recommend that you review these information carefully in order to better understand your rights and obligations with regard to such content.

Privacy of Children

VAS2Nets's Policy contains the following disclosure statement for children:

"VAS2Nets respects the privacy of children. We do not knowingly collect names, email addresses or any other personally identifiable information from children. We do not knowingly market to children nor do we allow children under 18 to open online accounts."

Promotional Messages

VAS2Nets may sometimes contact you with products or services that we think may be of interest to you. If you don't want to receive such promotional materials from us, you can opt out at any time by sending an email to info@VAS2Nets.com

Privacy Policy Changes

This policy may be revised on an ad-hoc basis to reflect the legal, regulatory and operating environment and such revised versions will automatically become applicable to you. We will post any revisions we make to our Privacy Policy on this page and such revised policy becomes effective as at the time it is posted. We also encourage you to check this page from time to time for updates to this policy.

Contact

Questions, comments and requests regarding this privacy policy are welcomed and should be addressed to info@vas2nets.com.

To contact our Data Protection Officer, kindly address your request to “The Data Protection Officer” at Seth House, 5 Stella Sholanke Street, Ajao Estate Muritala Muhammed International Airport Road, Lagos

This privacy policy was last updated on 25th February, 2022.

Signed;

MD/CEO,

Ayo Stuffman