

## **Privacy Policy**

*Last Reviewed or Revised: March, 2025*

At Hawksworth Advisors Limited (“Hawksworth”), we understand the importance of your privacy and are dedicated to protecting your personal information. This Privacy Policy outlines how we collect, use, and safeguard your personal data when engaging with Hawksworth’s websites, applications, and digital platforms (collectively referred to as our “Sites”), as well as through our professional interactions, including services, events, surveys, and communications.

This policy is intended to ensure that we:

- Comply with data protection law and follow best practices;
- Protect the rights of team employees, customers and partners;
- Are transparent about how we store and process individuals’ data;
- Are protected from the risks of a data breach.

Protecting the confidentiality and integrity of personal data is a critical responsibility that we take seriously at all times. This policy is therefore intended to apply to the personal data that we process about you. It also applies to you in situations where your role involves you processing data on our behalf.

Please note that depending on your relationship with Hawksworth, additional or specific privacy policies may apply, as described in subsequent sections.

### **Data protection principles**

We adhere to the principles relating to the processing of personal data, as set out in the Nigeria Data Protection Act (NDPA) and Nigeria Data Protection Regulations (NDPR). These require personal data to be:

- Processed lawfully, fairly and in a transparent manner in relation to individuals;
- Collected only for specified, explicit and legitimate purposes (“purpose limitation”) and not further processed in a manner that is incompatible with those purposes; further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall not be considered to be incompatible with the initial purposes;
- Adequate, relevant and limited to what is necessary in relation to the purposes for which it is processed (“data minimisation”);
- Accurate, and where necessary, kept up to date (“accuracy”) every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay;
- Not kept in a form which permits identification of data subjects for longer than is necessary (“storage limitation”) for the purposes for which the personal data are processed; personal data may be stored for longer periods in so far as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes subject to implementation of the appropriate technical and organisational measures required by the NDPR and NDPA in order to safeguard the rights and freedoms of individuals; and
- Processed in a way which ensures its security, using appropriate technical and organisational measures to protect against unauthorised or unlawful processing, and against accidental loss, destruction or damage (“integrity and confidentiality”);

In addition to these 6 core principles there are a number of other obligations on us (as the data controllers) and rights that you have in relation to your data (as data subject). These include requirements that your personal data is:

- Not transferred to another country without appropriate safeguards in place;
- Made available to data subjects, who must be allowed to exercise certain rights in relation to their personal data.;

### **General provisions**

- This policy applies to all personal data processed by Hawksworth
- This policy shall be reviewed at least annually.

### **Collection of Personal Data**

We may collect the following categories of personal data:

- **Identity Information:** Including your name, title, gender, and date of birth.
- **Contact Information:** Such as your email address, phone number, and postal address.
- **Professional Details:** Including your occupation, employer, and professional qualifications.
- **Usage Data:** Such as how you interact with our Sites, including IP addresses, browser type, and access times.
- **Other Information:** Including preferences or feedback provided through surveys, event registrations, or other professional interactions.

We may collect this data directly from you or through third-party sources, such as public databases or business partners, in compliance with applicable laws.

## ***What are the legal bases for processing your personal data?***

We will only process (i.e., use) your personal data in accordance with the law in the following circumstances:

- **Consent:** where you have provided us with your consent for the processing of your personal data;
- **Contractual Obligation:** where we need to perform a contract we have entered into with you as a party;
- **Legal or regulatory obligation:** where we need to comply with a legal or regulatory obligation that we are subject to for example the anti-money laundering checks or disclosures to law enforcement;
- **Vital interests:** where necessary to protect your vital interest or that of another person.

## ***Understanding Consent***

- Your consent is given when you voluntarily provide your documents or information to us to facilitate the provision of our core and other services to you.
- You are also consenting to our processing of your personal data when you log on our website, or signup for webinars or other events, or subscribe to our email alerts, or when you provide us with your personal data to enable you participate at our events, receive information from us, or utilize our services.
- If we ask for your sensitive personal data (such as race, ethnicity, religious beliefs, sexual orientation, and health data) or your personal information for a secondary reason, like marketing, we will either ask you directly for your express consent, or provide you with an opportunity to say no.
- We will only use your personal data for the purposes you have consented to, unless we reasonably consider that we need to

use it for another purpose and that purpose is compatible with the original purpose. If we need to use Your Personal Data for an unrelated purpose, we will duly notify you.

- Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

## **Use of Personal Data**

Hawksworth uses your personal data for the following purposes:

- To provide services and fulfill contractual obligations.
- To communicate with you regarding updates, invitations, or events.
- For marketing purposes, subject to your consent where required by law.
- To improve our Sites and tailor content to user preferences.
- To comply with legal and regulatory obligations under Nigerian laws.

We ensure that all processing of personal data is lawful, fair, and transparent, as mandated by the NDPR.

## **Sharing of Personal Data**

Hawksworth may share your personal data:

- With affiliates and trusted service providers who assist in delivering services.
- When disclosed in compliance with a valid Court order or as required by law or regulatory authorities in Nigeria, including responding to lawful requests or enforcing legal rights.

- During business transactions, such as mergers or acquisitions, where personal data forms part of the transferred assets.

We do not sell your personal data to third parties.

### **Data Retention**

We retain your personal data only for as long as necessary to fulfill the purposes outlined in this Privacy Policy or as required by law. Data may be anonymized or securely deleted when no longer needed.

### **Your Rights**

Under the NDPA, you have the following rights regarding your personal data:

- **Right to Consent:** Right to give or withhold consent before your personal data is processed, except where processing is necessary for legal obligations.
- **Right to be Informed:** Right to be provided clear and transparent information about the processing of personal data, including the purpose, legal basis, and retention period.
- **Right to Access:** Right to request a copy of the personal data we hold about you.
- **Right to Rectification:** Right to request corrections to incomplete or inaccurate data.
- **Right to Erasure:** Right to request the deletion of personal data under certain conditions.
- **Right to Restrict Processing:** Right to request limitations on data processing in specific circumstances.
- **Right to Data Portability:** Right to request the transfer of your data to another organization.
- **Right to Object:** Right to object to processing for direct marketing purposes or on grounds relating to your situation.

- **Right to Lodge a Complaint** – Right to lodge a complaint with National Information Technology Development Agency (NITDA) or any relevant supervisory authority if you believe your data protection rights have been violated.
- **Right to Seek Redress and Compensation** –Right to seek judicial redress and claim compensation for damages suffered due to breach.

To exercise any of these rights, please contact our Legal Department using the contact details provided below.

### **Security of Your Data**

We implement technical and organizational measures to safeguard your personal data against unauthorized access, loss, or misuse. These measures include data encryption, secure servers, and regular security assessments.

We must secure personal data by taking technical and organizational measures against unauthorized or unlawful processing, and against accidental loss, destruction or damage. Such safeguards may include the use of encryption, secure servers, regular security assessment and pseudonymization. We will exercise particular care in protecting special categories of personal data and criminal convictions data.

### **International Data Transfers**

Where Hawksworth transfers personal data outside Nigeria, we ensure appropriate safeguards are in place to protect your data, including contracts that align with NDPR requirements.

## **Updates to this Privacy Policy**

We may update this Privacy Policy periodically to reflect changes in our practices or legal obligations. We encourage you to review it regularly.

## **Personal Data Breaches**

Should a breach of personal data occur, we will usually notify the appropriate regulator (unless it is assessed that the breach is unlikely to result in a risk to the rights and freedoms of individuals) and, in certain instances, the data subject. We are also obliged to keep a record of all personal data breaches.

## **Contact Information**

If you have any questions, concerns, or requests regarding this Privacy Policy, please contact: [legal@hawksworth.org](mailto:legal@hawksworth.org)

This Privacy Policy is issued under the laws of the Federal Republic of Nigeria and reflects our commitment to complying with all applicable privacy regulations.