



## WEBSITE PRIVACY NOTICE

### 1. Overview

This Privacy Notice provides information on how Falcon Corporation collects and processes your personal data when you visit our website and other related platforms (“Site”). It sets out what we do with your personal data and how we keep it secure and explains the rights that you have in relation to your personal data.

### 2. Nature of Personal Data We Collect and Process

The Company collects the following personal data and non-personal data directly from you when you register your personal details on our Site:

- contact details such as your full name, postal addresses, phone numbers and email addresses;
- marketing preferences.

We automatically collect and store certain types of information regarding your use of our Site including information about your searches, views, downloads and purchases.

### 3. Cookies

Cookies enables us to distinguish you from other users of our website, which helps us to provide you with an improved browsing experience. For more information about cookies and how we use them, please read our Cookie Policy by clicking this link - <https://www.falcon-corporation.com/fcl/cookie/>.

### 4. Use and Legal Basis for Processing Your Personal Data

We are committed to ensuring that your personal data is processed lawfully, fairly, and transparently in accordance with applicable data protection laws. The purposes for which we use your personal data, and the corresponding lawful bases, are outlined below:

#### Consent

Where you have provided your explicit consent, we may process your personal data for specific purposes such as:

- Sending you marketing communications, newsletters, or promotional materials.
- Using cookies or other tracking technologies for personalization and analytics.

You may withdraw your consent at any time without affecting the lawfulness of processing based on consent before its withdrawal.

#### Performance of a Contract

We process your personal data where it is necessary to fulfill our contractual obligations to you or to take steps at your request prior to entering into a contract. This includes:



- Registering and onboarding you as a new user (i.e. customer, vendor etc.) on our platform.
- Processing your requests and providing you our products or services.
- Managing your relationship with us, including account administration and customer support.

### **Compliance with Legal and Regulatory Obligations**

We may process your personal data where required to comply with applicable laws, regulations, or directives. This includes:

- Verifying your identity or carrying out due diligence where necessary.
- Meeting record-keeping, tax, and reporting obligations.
- Responding to lawful requests from public authorities or regulators.

### **Legitimate Interests**

We may process your personal data where it is necessary for our legitimate business interests or those of a third party, provided that such interests are not overridden by your fundamental rights and freedoms. Examples include:

- Improving our website functionalities, products, and services.
- Preventing, detecting, and managing risks relating to fraud, misuse, or illegal activities.
- Enhancing user experience and service quality through feedback and analytics.

### **Protection of Vital Interests**

We may process your personal data where necessary to protect your vital interests or those of another natural person. For example, in situations involving potential harm, safety incidents, or emergencies.

### **Public Interest**

Where applicable, we may process personal data for the performance of a task carried out in the public interest or in the exercise of official authority vested in the Company.

## **5. Sharing of Your Personal Data with Third-Parties**

We may need to share your personal data with third-parties under the following circumstances:

- a. to enable us provide our services to you, end to end.
- b. to analyze data, provide marketing assistance, process payments, transmit content, and provide customer service.
- c. to comply with applicable laws and regulations or to respond to valid legal process, including from law enforcement or other government agencies.
- d. to protect the rights of our customers, operate and maintain the security of our systems and network to ensure the preservation of life and property and prevention of fraud and cyberattack.



- e. to protect the rights or property of the Company or others, including enforcing our agreements, terms, and policies.

## **7. Transfer of Personal Data Abroad**

Falcon Corporation shall implement appropriate safeguards to ensure the security of personal data to be transferred to a foreign country in compliance with the provision of the Nigeria Data Protection Act 2023 (“NDPA”) and the General Application and Implementation Directive, 2025 (“GAID”) or any other applicable data protection legislation. In particular, we shall, among other things, enter into Data Processing Agreements with the recipients of such personal data in the foreign country to ensure protection of your personal data.

Where personal data is to be transferred to a recipient in a foreign country deemed to have inadequate data protection laws, the Company will take all necessary steps to ensure that informed consent is obtained from you, and you are aware of the risks inherent including ensuring that personal data is transmitted in a safe and secure manner.

## **8. Data Security and Retention**

We take the security of your personal data in our possession seriously. In line with our commitment to protect your personal data in our possession, we have developed appropriate organizational, technical and physical measures to protect the personal data you provide, or we collect against unauthorized access, loss or theft, as well as against any risk of loss, disclosure, copying, misuse or modification. Such measures include but are not limited to the use of secure servers, firewall, multiple factor authentication security, data anonymization and pseudonymization (as may be necessary), data encryption and granting access on a need-to-know basis only to employees in order to perform their job responsibilities.

The Company will only retain your personal data under the following circumstances:

- as long as reasonably necessary for the purpose of providing our services to you; and
- for the period needed to comply with our legal and statutory obligations under applicable law.

## **9. What are Your Rights in relation to our Collection and Processing of your Personal Data**

Users of our Site are entitled to exercise the following rights in relation to their personal data collected and processed by the Company:

- right to withdraw consent in relation to the processing of their personal data;
- right to be informed regarding their personal data;
- right to request for and access any personal data collected and stored by the Company;
- right to request the deletion of their data;
- right to be informed about appropriate safeguards in place where data is transferred abroad;
- right to request rectification of personal data which is stored by the Company;
- right to request the transmission of data from the Company to a third party (right to the portability of data);



- right to object to automated decision making and processing;
- right to object to direct marketing;
- right to request the processing of their information; and
- right to lodge a complaint with the NDPC.

#### **10. Review of our Privacy Notice**

We may need to review and make necessary updates, modifications or amendments to our Privacy Notice to ensure compliance with applicable data protection legislations including the NDP Act/GAID or as a result of changes in our systems and processes arising from the use of technology. We will notify you of any material changes in the way we collect and process your personal data on our Site by placing a notice online or via email. Your continuous use of our services after such notice, will be construed as your consent to carry on with the processing of your personal data.

#### **11. Dispute Resolution and Complaint Handling Mechanism**

In line with our objective of creating a rewarding customer experience on our website and mobile application, the Company has developed a dispute resolution and complaint handling process to ensure the effective management and timely resolution of all complaints relating to this Privacy Notice. In the event that you have any complaint regarding this Privacy Notice, please send us an email via DPO's email address: [dpo@falcon-corporation.com](mailto:dpo@falcon-corporation.com). We will investigate and work towards ensuring the prompt resolution of all disputes and complaints relating to the use and disclosure of personal data in line with the provisions of the NDP Act/GAID.

In the event that the outcome of the resolution of your complaint is unsatisfactory, you are at liberty to lodge a complaint to the Nigeria Data Protection Commission (NDPC).

#### **12. Contact Details of our Data Protection Officer (DPO)**

In the event that you have any questions or inquiries relating to the collection and processing of your personal data on our Site or the exercise of your rights as a data subject under the NDP Act/GAID, please send an email to our DPO via email at [dpo@falcon-corporation.com](mailto:dpo@falcon-corporation.com)