

NGWAFOR & PARTNERS: PRIVACY STATEMENT

Updated: 16 January 2024

NGWAFOR & PARTNERS LAW FIRM, Yaoundé, Cameroon (“Ngwafor & Partners,” “we,” or “us”) respects the sensitive nature of any Personal Information you provide to us. We have created this Privacy Policy in order to demonstrate as a ‘Data Controller’ our commitment to the privacy of our clients, employees, and other individuals whose Personal Information is provided to us.

We are bound by the Constitution of Cameroon, international conventions on human rights which our country is a party, and other relevant legislation particularly the European General Data Protection Regulation (GDPR). We also adhere to other best practices that effectively exercise the rights of persons when their Personal information is processed.

This Privacy Policy describes our information collection, storage and disclosure practices in regard to the services and advice that Ngwafor & Partners provides for clients (“client(s),” “you,” or “your”), including the legal services we provide to our clients (“Services”).

This Privacy Policy also describes the choices clients have regarding how Personal Information is collected and used by us and third parties who provide services for us, as well as rights that may be conferred by applicable laws.

When we process personal data of residents of the European Economic Area (“EEA”), which include the member states of the European Union (“EU”) we apply the GDPR especially to sections relating to the “Rights of EEA Residents” and “International Data Transfers”.

For residents from the State of California, we consult and apply sections of the “California Privacy Rights” including rights under the California Consumer Privacy Act (“CCPA”).

We reserve the right to change this Privacy Policy at any time. In the event we make changes to this Privacy Policy, we will provide clients with a copy of the Privacy Policy at their contact address or e-mail address with the date such modifications were made indicated on the top of the page or we may contact clients to inform them about the revisions with a link to the revised Privacy Policy.

All changes are effective on the date listed at the top of this page and will apply to all information that we have about you. Your continued use of the Services that we provide after any change is posted indicates your acceptance of the changes and your continued consent to our processing of Personal Information provided to us. If at any point you do not agree to any portion of the Privacy Policy, you should immediately inform us.

We encourage you to review this Privacy Policy carefully. If you have any questions concerning this Privacy Policy or our information collection, storage, and disclosure practices, please contact us at the

address below:

The House of Gideon, Boulevard John Paul II, Golf- Bastos, P.O. Box 8211, Yaounde, Cameroon, **Email:** info@ngwaforpartners.com, **Phone:** (+237) 222 228 448 / (+237) 674 300 086 Fax: (+237) 222 229 190.

Information We Collect

“Personal Information” is information that may be used to directly or indirectly to identify an individual (which in some cases, may include certain Device Information). The Personal Information we collect may include:

- (a) names, aliases, postal addresses, unique personal identifiers, online identifiers, Internet Protocol (IP) address, email address, account name, tax payer number, driver’s license numbers, national identity card numbers, passport numbers or other similar identifiers;
- (b) bank account numbers, insurance policy numbers, education, employment, employment history, financial information, medical information, or health insurance information;
- (c) commercial information, including records of personal property, products or services purchased, obtained or considered, or other purchasing or consuming histories or tendencies;
- (d) internet or other electronic network activity information;
- (e) audio, electronic, visual or similar information including information collected using CCTV cameras;
- (f) professional or employment-related information; and
- (g) education information that is not publicly available. We may combine the Personal Information that we obtain about individuals from more than one source.

Most of the Personal Information we collect about individuals is provided to us either by the individuals themselves or by clients who have or control Personal Information about individuals, such as the employees of a business. It is our obligation to provide such individuals with required notices and to obtain any necessary consents from the individuals before providing us with their Personal Information.

How we obtain your Personal Information

When you visit our Website or use our services, we collect your Personal Information. The ways we collect your data is categorised as follows:

- a) Website – When individuals visit or use some parts of our Website and/or services we might ask you to provide Personal Information to us,
- b) Clients and individuals – Personal Information is obtained through email, telephone, post and any similar mode of communication,
- c) Publicly accessible Personal Information – This data can be available through public institutions or public bodies for example, the company’s registry.

How we process your Personal Information

The Personal Information we collect about you is kept to a minimum and we process individual’s personal data to:

- ✚ Meet regulatory and legal requirements under national and international privacy laws,
- ✚ Provide our services to our clients,
- ✚ Promote our services and to manage our relationship with clients, prospective clients and colleagues,
- ✚ Manage and supervise employees
- ✚ Registration, delivery and participation of training courses and webinars,
- ✚ Informing you of any upcoming regulations and services,
- ✚ For purposes of communication and support.

Our lawful basis for using Personal Information

All Personal Information will be used:

- a) to perform our service contract with you, or
- b) where we have legitimate interest to process Personal Information and that they not overridden by individual's rights, or
- c) Where there is a vital interest, or
- d) in accordance with a legal obligation, or
- e) where we have your consent.

If you are an individual who doesn't have a client relationship with our firm, but believe that someone has entered your personal data into our Website or sent your personal data to us, you'll need to report the issue immediately and provide us with detailed information for the matter to be investigated and rectified.

How and When Personal Information Is Shared with Other Parties

We do not sell, trade or license Personal Information about our clients or any individuals for marketing purposes. We do, however, work with a number of trusted partners who perform vital functions as part of our operations, including managing client support, facilitating marketing communications by e-mail and post, and other functions. We do not share Personal Information unless it is necessary to fulfil our responsibilities, including providing information or Services to clients.

Additional Sharing of Information.

We may engage third parties to help us carry out certain other internal functions such as account processing, client services, or other data collection relevant to our business. Personal Information is shared with these third parties only to the extent necessary for us to process the transactions you initiate or perform other specific Services. Our partners are legally required to keep Personal Information private and secure.

We may share Personal Information with law enforcement or other government agencies as required by law or for the purposes of limiting fraud. We reserve the right to disclose Personal Information when we believe that disclosure is necessary to protect our rights or to comply with a judicial proceeding, court order or legal process. Subject to our legal and ethical obligations, including the obligation to preserve client confidentiality and attorney-client privileged communications, we further reserve the right to disclose any Personal Information that we believe, in good faith, appropriate or necessary to take precautions against liability, to investigate and defend against any third-party claims or allegations, to assist government enforcement agencies, to protect the security or integrity of the Services, or to protect the rights, property or personal safety of us, our clients or others.

We will not share Personal Information if such sharing is prohibited by applicable Cameroon privacy and data protection laws, including, without limitation, the EEA's General Data Protection Regulation.

International Data Transfers

While providing our services we may need to transfer Personal Information to countries outside of Cameroon. When such data transfer is needed, we would consider:

- ✚ Whether the data transfer is a 'restricted data transfer', in which case we would find out whether we can make the transfer subject to 'appropriate safeguards'
- ✚ We would ensure that the individuals whose data is transferred have a level of protection commensurate with the level of protection under the UK GDPR or Cameroon Privacy Act if there

are any exceptions applicable under the UK GDPR or Cameroon Privacy Act.

- ✚ If there are no appropriate safeguards then we would take additional steps, such as binding contracts or corporate rules with the recipient of the individual's data.

Security

Security is a priority for us when it comes to an individual's Personal Information. We are absolutely committed to protecting your Personal Information and have appropriate technical and organisational measures in place to make sure all Personal Information are secured and protected.

Retention

The length of time we keep your Personal Information depends on what it is and whether we have an ongoing business need to retain it (for example, to provide you with a service you've requested or to comply with applicable legal, tax or accounting requirements).

We will retain your Personal Information for as long as we have a relationship with you and for a period of time afterwards where we have an ongoing business need to retain it, in accordance with our data retention policies and practices. Following that period, we will make sure it's deleted or anonymised.

Rights to your information

By writing to us using the contact details provided above, you have the right to ask us:

- ✚ for a copy of the Personal Information, we hold about you
- ✚ for a copy of the Personal Information, you provided to us to be sent to you or a third party in a commonly used, machine readable format
- ✚ to update or correct your Personal Information to keep it accurate
- ✚ to delete your Personal Information from our records if it is no longer needed for the original purpose; and
- ✚ to restrict the processing of your Personal Information in certain circumstances

And you may also:

- ✚ object to us processing your Personal Information – in which case we will either agree to stop processing or explain why we're unable to;
- ✚ contact us to in relation to a decision based solely on automated processing (including profiling) necessary for entering into a contract with us, to express your point of view and to contest the decision; and
- ✚ where we rely on your consent, withdraw that consent at any time.
- ✚ Please note that the above rights are not absolute and certain exemptions apply to them.

You can also make a complaint to the regulatory authority if you feel your Personal Information has been mishandled.

In case of any issues, and in the first instance, we request you to give us a chance to deal with any

concerns before you contact the Regulator, kindly use the contact details given above.

Notifications and Communications from Ngwafor & Partners.

Legal or Security Communications

We also send out notices that are required for legal or security purposes. For example, certain notifications are sent for your own protection. In other cases, these notifications involve changes to various legal agreements or policies. Generally, you may not opt-out of such emails. We may also send you responses to emails you send us, if appropriate.

