

PRIVACY NOTICE

Version: 1.0

1. Introduction

A&C Founders Fund Limited ("Founders Fund," "we", "us", or "our") is committed to protecting the privacy and fundamental rights of individuals in accordance with the Nigeria Data Protection Act (NDPA) 2023 and the Nigeria Data Protection Commission (NDPC) Guidelines.

This Privacy Notice explains how we collect, use, store, and protect your personal information when you:

- Visit our website
- Apply to Founders Fund
- Participate in our mentorship or investment programmes
- Sign up for our newsletters or events
- Interact with us through any online channels

2. Data Controller Information

For the NDPA 2023, Founders Fund is the Data Controller. This means we determine the purposes and means of processing your personal data.

Items	Details
Business Name	A & C Founders Fund
Address	2, Dele Adedeji, Lekki Phase One. Lagos. Nigeria.
DPO/Privacy Contact	Ufedojo Shaibu Musa, Legal Counsel.
Email	privacy@Foundersfund.com

If you have any questions about this Privacy Notice or how we handle your data, please contact our Data Protection Officer (DPO) using the information above.

3. Personal Data We Collect

We may collect and process the following categories of personal data:

Basic Identification Data

- Full name
- Email address
- Telephone number
- Date of birth (where required for eligibility checks)
- Nationality

Professional Information

- Employment history
- Educational background

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- Professional profile links (e.g., LinkedIn)
- CV/Resume

Business Information (for Founders Fund applicants)

- Startup details and business name
- Incorporation records
- Shareholding information
- Pitch decks and business plans
- Financial forecasts and funding history

Technical Data (via cookies and analytics)

- IP address
- Device information
- Browser type and version
- Website activity logs
- Cookie identifiers

Audio/Visual Data

- Photographs (if provided)
- Video recordings of interviews (with your consent)

4. How We Collect Your Personal Data

We collect personal data through the following channels:

- Website application forms
- Email correspondence
- Video interviews
- Event registration forms
- Direct submissions from you

5. Legal Basis for Processing

Under the NDPA 2023, we must process your personal data based on a valid legal ground. The table below explains our legal bases for each processing activity:

Processing Activity	Lawful Basis	Justification
Processing your Founders Fund application	Pre-contractual measures	Necessary to assess your eligibility before entering into any investment agreement
Due diligence and background checks	Legitimate interests	Necessary to verify information and prevent fraud. We have balanced this against your rights and found no disproportionate impact

KYC and regulatory compliance	Legal obligation	Required by applicable laws and regulations
Sending marketing communications	Consent	You have actively opted in to receive such communications. You may

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		withdraw consent at any time
Website functionality cookies	Legitimate interests	Necessary for the website to function properly
Analytics and marketing cookies	Consent	You have actively accepted these via our cookie banner
Security monitoring	Legitimate interests	Necessary to protect our website and systems from cyber threats

Legitimate Interests Assessment

Where we rely on legitimate interests, we have conducted an assessment to ensure our interests do not override your fundamental rights and freedoms. Our legitimate interests include:

- Preventing fraud and ensuring the security of our platform
- Improving our services and website functionality
- Conducting due diligence on applicants

6. Consent

Where we rely on your consent as the legal basis for processing:

- You have the right to withdraw your consent at any time
- Withdrawal of consent does not affect the lawfulness of processing based on consent before its withdrawal
- We will provide you with easy mechanisms to withdraw consent (e.g., unsubscribe links in emails)

7. Cookies and Tracking Technologies

Our website uses cookies and similar tracking technologies. In compliance with the NDPC's General Application and Implementation Directive (GAID) 2025, we provide a cookie notice that is conspicuously displayed on our homepage.

What Are Cookies?

Cookies are small text files stored on your device when you visit a website. They help us

remember your preferences and understand how you interact with our site.

Types of Cookies We Use

Type	Purpose	Consent Required
Strictly Necessary Cookies	Enable core website functionality (e.g., security, load balancing)	No - Legitimate Interest
Functional Cookies	Remember your preferences and	settings Yes - Opt-in Consent
Analytics Cookies	Help us understand how visitors use our website	Yes - Opt-in Consent
Marketing Cookies	Track your activity for advertising purposes	Yes - Opt-in Consent

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Cookie Consent Mechanism

- Our cookie notice will appear when you first visit our website
- The notice significantly obstructs the middle, left, or right side of the homepage to ensure it is not ignored
- You have the opportunity to accept or decline non-essential cookies - Displaying the cookie notice at the bottom of a webpage is not compliant with NDPC requirements
- You can change your cookie preferences at any time through our cookie

settings 8. **How We Use Your Personal Data**

We use your personal data for the following purposes:

1. Processing and assessing Founders Fund applications
2. Verifying eligibility and conducting due diligence
3. Making investment decisions
4. Matching applicants with mentors
5. Managing our programmes and events
6. Communicating with you about your application
7. Sending newsletters and marketing communications (with your consent)
8. Complying with legal and regulatory obligations
9. Improving our website and services
10. Preventing fraud and enhancing security

9. **Data Sharing and Disclosure**

We may share your personal data with the following categories of recipients:

Programme Partners

- Co-Creation Hub (CcHUB) - As our implementation partner for programme management, application review, and due diligence

- Argentil Capital Management Limited - As our financial advisor for investment decisions

Service Providers (Data Processors)

We may use third-party service providers to help us deliver our services, including:

- Cloud storage providers
- Customer Relationship Management (CRM) systems
- Email marketing platforms
- Analytics providers
- Video conferencing platforms

Other Disclosures

We may disclose your data:

- To comply with legal obligations or court orders
- To protect the rights, property, or safety of Founders Fund, our users, or others
- In connection with a merger, acquisition, or sale of assets

10. International Data Transfers

Your personal data may be transferred to and processed in countries outside Nigeria. Where such transfers occur, we ensure appropriate safeguards are in place, including: - Standard Contractual Clauses (SCCs) approved by the NDPC

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- Adequacy decisions where applicable
- Binding corporate rules for intra-group transfers

You may request a copy of the transfer mechanisms we use by contacting our

DPO. 11. Data Retention

We retain your personal data only for as long as necessary to fulfill the purposes for which it was collected, including legal, accounting, or reporting requirements.

Data Category	Retention Period
Website logs	6 months
Rejected applicants	6 months (to consider for future programmes)
Shortlisted applicants	24 months
Successful applicants (invested)	7 years post-investment (for legal and regulatory compliance)
Marketing data	Until consent is withdrawn
Event recordings	24 months

After the retention period expires, we will securely delete or anonymize your data.

12. **Your Rights as a Data Subject**

Under the NDPA 2023 and the GAID 2025, you have the following rights regarding your personal data:

Right	Description
Right to be Informed	You have the right to receive clear, transparent information about how we process your data
Right of Access	You can request a copy of the personal data we hold about you
Right to Rectification	You can request the correction of inaccurate or incomplete data
Right to Erasure (Right to be Forgotten)	You can request deletion of your data where there is no compelling reason for continued processing
Right to Restrict Processing	You can request that we limit how we use your data
Right to Data Portability	You can request to receive your data in a structured, machine-readable format and transmit it to another controller
Right to Object	You can object to processing based on legitimate interests or direct marketing
Right to Withdraw Consent	You can withdraw consent at any time where consent was the legal basis

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Right to Lodge a Complaint	You can complain to the NDPC or seek judicial redress
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How to Exercise Your Rights

To exercise any of these rights, please get in touch with us at:
privacy@Foundersfund.com

We will respond to your request within 30 days as required by the NDPA 2023. If your request is complex or you have made multiple requests, we may extend this period by a further 30 days and will notify you of the extension.

There is no fee for exercising your rights, unless your request is manifestly unfounded or

excessive.

13. **Data Security**

We implement appropriate technical and organisational measures to protect your personal data, including:

- Encryption of data at rest and in transit
- Multi-factor authentication for system access
- Role-based access controls limiting who can access your data
- Regular security assessments and audits
- Staff training on data protection

In the event of a personal data breach, we will notify the NDPC within 72 hours as required by the NDPA 2023.

14. **Children's Data**

Our website and programmes are not directed at children under the age of 13. For the NDPA 2023, a "child" is any person below thirteen (13) years.

If we discover that we have inadvertently collected personal data from a child under 13 without verified parental or guardian consent, we will delete that information immediately.

15. **Changes to This Privacy Notice**

We may update this Privacy Notice from time to time. Any changes will be posted on this page with an updated "Last Updated" date. Where changes are significant, we will notify you via email or through a notice on our website.

16. **Complaints and Supervisory Authority**

If you are not satisfied with our response to your privacy concern, you have the right to lodge a complaint with the Nigeria Data Protection Commission (NDPC):

Details	Information
Address	No. 12 DR Clement Isong Street, Asokoro, Abuja
Email	info@ndpc.gov.ng
Phone	+234 (0) 916 061 5551

17. **Contact Us**

If you have any questions about this Privacy Notice or our data processing practices, please contact:

Legal Counsel: Ufedojo Shaibu Musa.

Email: privacy@Foundersfund.com

Address: 2, Dele Adedeji, Lekki Phase One. Lagos. Nigeria.

Cookie Notice

Cookie Notice

We use cookies to enhance your browsing experience, analyze site traffic, and personalize content. Strictly necessary cookies are always active. Other cookies require your consent.

- Strictly Necessary (Always On)
- Functional (Optional)
- Analytics (Optional)
- Marketing (Optional)

You can change your preferences at any time.

See our Privacy Notice for more information.