

DATA PROTECTION COMPLIANCE REPORT

Prepared By:
Floliz Nigeria Limited

Prepared For:
CEVIANT ASSET MANAGEMENT LIMITED

DATA PROTECTION AUDIT REPORT

Company Name	CEVIANT ASSET MANAGEMENT LIMITED
RC Number	7796910
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Phone Number	+2347036773402
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State	LAGOS
Sector	FINANCE - FUND AND PORTFOLIO MANAGEMENT

1. Executive Summary

This report presents the findings from the Data Protection Audit conducted for **CEVIANT ASSET MANAGEMENT LIMITED**, in accordance with the Nigeria Data Protection Act (NDP Act) 2023, the **Nigeria Data Protection Commission (NDPC)** Guidelines, and globally recognized best practices.

The audit assessed **CEVIANT ASSET MANAGEMENT LIMITED** data governance, processing activities, privacy documentation, incident response readiness, employee awareness, and overall compliance posture. While the company has taken commendable steps in its data protection journey, a few gaps were identified that require attention for full regulatory compliance.

2. Audit Objectives

- Assess the current state of compliance with the **NDP Act 2023**.
- Identify data protection risks and vulnerabilities.
- Evaluate the effectiveness of internal controls and data governance.
- Recommend remediation strategies for full compliance.

3. Detailed Observations

3.1. Privacy Policy

- A privacy policy exists and is accessible.
- Reviewed annually, but biannual review is recommended.
- Includes clauses on rights, legal basis, and third-party sharing.

3.2. Consent Management

- Consent is obtained via onboarding forms and digital platforms.
- Forms are written in plain English and stored securely.
- Data subjects can withdraw consent through a documented process.

3.3. Data Subject Rights (DSAR)

- DSAR requests are managed through standardized forms.
- Internal teams understand request timelines and escalation paths.

3.4. Data Breach Management

- Internal breach form is available.
- Incidents are logged but post-incident reviews need formalization.
- External notifications follow NDP Act 2023 72-hour rule via DPO coordination.

3.5. Data Protection Officer (DPO)

- A DPO has been designated and trained.
- Semi-annual reporting to management has not yet started.
- Needs to formalize audit tracking and compliance KPIs.

3.6. Training & Awareness

- Staff training is regular but requires tracking logs.
- Management receives strategy-aligned training quarterly.

Recommendations

- **Initiate DPO Reporting:** Biannual data protection reports to be submitted to senior management covering incidents, training, and audit insights.
- **Review and Version Privacy Policy:** Establish a changelog and schedule policy reviews twice yearly.
- **Improve Incident Response Workflow:** Conduct simulations and document post-incident lessons learned.
- **Implement Audit Logs:** Track all DSARs, breaches, and consent withdrawals for transparency and audit readiness.
- **Strengthen Vendor Risk Management:** Ensure Data Processing Agreements (DPAs) are in place for all third-party processors.
- **Enhance Awareness Campaigns:** Use infographics and quizzes to improve employee engagement.



NDPC
NIGERIA DATA PROTECTION COMMISSION

REGISTRATION ID: NDPC/DCP/06231

VALID THROUGH: 10/03/2025 TO 10/03/2027

CERTIFICATE

OF REGISTRATION

This is to certify that:

CEVIANT ASSET MANAGEMENT LIMITED

**is registered as a data controller/ processor of major importance
pursuant to Section 44 of the Nigeria Data Protection Act, 2023.**

AUTHORIZED SIGNATURE

10th March, 2025

DATE





PRIVACY POLICY

PRIVACY POLICY

CEVIANT ASSET MANAGEMENT LIMITED

PREAMBLE: DATA PRIVACY NOTICE

CEVIANT ASSET MANAGEMENT LIMITED (“the Company”, “we”, “us” or “our”) values the privacy of its customers, employees, partners, and all stakeholders. This Privacy Policy explains how we collect, use, store, protect, and share personal data in compliance with the **Nigeria Data Protection Act 2023 (NDP Act 2023)** and the **General Application and Implementation Directive 2025 (GAID)**.

PART 1: OUR COMMITMENT TO DATA PROCESSING PRINCIPLES

We process all personal data in line with the principles of data protection under Section 24 **NDP Act 2023**:

- Lawfulness, fairness, and transparency.
- Purpose limitation.
- Data minimization.
- Accuracy and integrity.
- Storage limitation.
- Confidentiality, integrity, and availability of data.
- Accountability.

PART 2: CONSENT OF DATA SUBJECT

We obtain lawful consent from data subjects where required, in clear and simple language. Consent may be withdrawn at any time without affecting the lawfulness of prior processing.

PART 3: OUR SCOPE OF DATA PROCESSING

We collect and process personal data such as:

- Identification data (name, gender, date of birth, ID numbers).
- Contact details (address, phone number, email).
- Financial information (bank details, payment records, transaction history).
- Employment data (for staff and job applicants).
- Compliance information as required by regulators (e.g., NDPC, CBN, SEC).

PART 4: DATA SUBJECT RIGHTS

Data subjects are entitled to the following rights:

- Right to information.
- Right of access.
- Right to rectification.
- Right to erasure.
- Right to restriction of processing.
- Right to data portability.
- Right to object to processing.
- Right not to be subject to automated decision-making.

Requests can be made via our **Data Protection Help Desk** (see Part 15).

PART 5: DATA RETENTION AND SECURITY

We retain personal data only for as long as necessary to fulfill lawful purposes, after which it will be securely deleted, anonymized, or archived. Security measures include controlled access, password protection, encryption (progressive implementation), and staff training.

PART 6: MANDATORY DATA COLLECTION

Certain personal data is collected to comply with legal and regulatory obligations, including Know Your Customer (KYC) requirements, Anti-Money Laundering (AML) regulations, and NDPC directives.

PART 7: TRANSFER OF DATA TO THIRD PARTIES

We may share data with regulators, service providers, auditors, or other lawful third parties under contract and with appropriate safeguards, including **Data Processing Agreements (DPAs)**.

PART 8: TECHNICAL INFORMATION AND COOKIES

When you use our website, we may collect technical information via cookies and analytics tools. Cookies help improve functionality, user experience, and compliance monitoring. Users can disable cookies in browser settings, though some features may not work optimally.

PART 9: PERSONAL DATA SECURITY AND INTEGRITY

We adopt organizational and technical safeguards to ensure the confidentiality, integrity, and availability of data. Measures include user-specific passwords, secured server locations, and access restriction to authorized personnel.

PART 10: JOB APPLICANTS

Data collected during recruitment is used only for employment purposes. If unsuccessful, applicant data is securely deleted or anonymized within a reasonable timeframe, unless retention is legally required.

PART 11: MAINTAINING ACCURATE INFORMATION

We strive to ensure personal data is accurate and up to date. Data subjects are encouraged to notify us promptly of any changes or inaccuracies.

PART 12: CHILDREN'S PRIVACY

We do not knowingly collect data of minors under 18 without parental or guardian consent. Where services apply to minors, appropriate safeguards and verifications are implemented.

PART 13: CAVEAT ON WEBSITE LINKS

Our website may contain external links. We are not responsible for the privacy practices or content of third-party websites.

PART 14: TRANSFER TO THIRD PARTIES AND CROSS-BORDER DATA TRANSFERS

We do not currently engage in cross-border data transfers. Should this change, transfers will only occur on lawful grounds, including adequacy decisions, approved instruments by NDPC, or explicit consent of data subjects.

PART 15: DATA PROTECTION HELP DESK

All data protection requests, concerns, or complaints should be directed to our **Data Protection Help Desk** at:

Email: mezie.nwogu@ceviant.co

Phone: 07036773402

Address: 8A Bendel Close, Off Bishop Aboyade Cole Street, Victoria Island 8A, Lagos.

PART 16: DATA DELETION

Personal data will be deleted once the lawful purpose of processing is fulfilled. Secure deletion, anonymization, or return of data will be applied in line with **NDP Act 2023** and **GAID 2025** requirements.

PART 17: DATA SUBJECT ACCESS REQUEST (DSAR)

Data subjects may submit DSARs for access, rectification, deletion, or objection to processing. Requests will be addressed within **30 days** in line with **NDP Act 2023** timelines.

PART 18: REMEDIATION

In the event of a breach, the Company will notify the NDPC within **72 hours** and affected data subjects immediately, where applicable. We will also implement corrective measures to prevent recurrence.

PART 19: ALTERATION OF PRIVACY POLICY

This Privacy Policy may be updated periodically to reflect legal, regulatory, or operational changes. Updates will be communicated via our official website or direct notifications where applicable.

PART 20: CONTACT INFORMATION

For further inquiries about this Privacy Policy or our data protection practices, please contact:

CEVIANT ASSET MANAGEMENT LIMITED

Address: 8A Bendel Close, Off Bishop Aboyade Cole Street, Victoria Island 8A, Lagos.

Email: mezie.nwogu@ceviant.co

Phone: 07036773402



INTERNAL DATA BREACH REPORT FORM

INTERNAL DATA BREACH INCIDENT REPORT FORM
CEVIANT ASSET MANAGEMENT LIMITED
INTERNAL DATA BREACH REPORT FORM

Section A – Reporter Information

- **Name of Staff Reporting:** _____
- **Department:** _____
- **Job Title:** _____
- **Contact Number:** _____

Section B – Breach Details

- **Date & Time of Incident:** _____
- **Location/Branch:** _____
- **System/Process Affected:** _____
- **Type of Breach (tick all that apply):**
 - ☐ Unauthorized access
 - ☐ Data loss (accidental deletion, loss of device, etc.)
 - ☐ Data theft (internal/external)
 - ☐ Disclosure to unauthorized party
 - ☐ Malware / Ransomware attack
 - ☐ Other (please specify): _____

Section C – Description of Incident

Provide a detailed description of what happened, including how the breach was discovered:

Section D – Data Involved

- Categories of data affected (e.g., customer records, financial data, staff data):

- Approximate number of data subjects affected: _____
- Sensitivity level (☐ High ☐ Medium ☐ Low).

Section E – Immediate Actions Taken

Describe actions taken immediately after discovery:

Section F – Signature

Reporter's Signature: _____ **Date:** _____

Supervisor's Acknowledgment: _____ **Date:** _____



EXTERNAL DATA BREACH NOTIFICATION FORM

EXTERNAL DATA BREACH NOTIFICATION FORM
CEVIANT ASSET MANAGEMENT LIMITED
(To the Nigeria Data Protection Commission & Affected Data Subjects)

Section A – Organization Information

- **Organization Name:** CEVIANT ASSET MANAGEMENT LIMITED
- **Registered Address:** _____
- **Contact Person / DPO:** _____
- **DPO Email & Phone:** _____

Section B – Breach Details

- **Date & Time of Breach:** _____
- **Date Reported to NDPC:** _____
- **Method of Discovery:** _____
- **Nature of Breach** (unauthorized access, loss, theft, disclosure, ransomware, etc.):

Section C – Personal Data Affected

- Categories of data compromised:
 - ☐ Identification Data
 - ☐ Financial Records
 - ☐ Biometric Data
 - ☐ Contact Information
 - ☐ Others (specify): _____
- Number of individuals affected (estimated): _____

Section D – Impact Assessment

- Potential risks to data subjects (e.g., fraud, identity theft, reputational harm):

- Severity Level (☐ High ☐ Medium ☐ Low).

Section E – Remediation Measures

- Immediate measures taken to contain the breach:

- Long-term corrective measures planned:

Section F – Notification to Data Subjects

- Were data subjects notified? (☐ Yes ☐ No)
- **Date of Notification:** _____
- **Method of Notification:** ☐ Email ☐ SMS ☐ Letter ☐ Website Notice ☐ Other

Section G – Declaration

We confirm that the information provided is accurate and complete, and this breach has been reported in compliance with the NDPA and GAID.

Authorized Signatory: _____

Designation: _____ **Date:** _____



DATA SUBJECT CONSENT WITHDRAWAL FORM

DATA SUBJECT CONSENT WITHDRAWAL FORM

CEVIANT ASSET MANAGEMENT LIMITED

Head Office: 8A Bendel Close, Off Bishop Aboyade Cole Street, Victoria Island

Email: mezie.nwogu@ceviant.co | **Phone:** 07036773402

SECTION A: INTRODUCTION

In line with the **Nigeria Data Protection Act (NDP Act) 2023** and the **General Application and Implementation Directive (GAID) 2025**, you have the right to withdraw previously granted consent regarding the collection, processing, storage, or sharing of your personal data.

Upon receipt of this form, **CEVIANT ASSET MANAGEMENT LIMITED** will stop processing your personal data for the purposes covered by your withdrawn consent, unless another lawful basis under the **NDP Act 2023** applies.

SECTION B: DATA SUBJECT INFORMATION

Full Name: _____

Contact Address: _____

Phone Number: _____

Email Address: _____

Customer ID/Account Number (if applicable): _____

SECTION C: CONSENT BEING WITHDRAWN

Please indicate the specific consent you wish to withdraw (tick as applicable):

- ☐ Marketing and promotional communications.
- ☐ Sharing of my data with third-party service providers.
- ☐ Processing of my financial transaction history.
- ☐ Processing of my employment/business data.
- ☐ Other (please specify): _____

SECTION D: ACKNOWLEDGEMENT

I understand that:

- i. Withdrawing consent does not affect the lawfulness of processing carried out before the withdrawal.
- ii. The Company may continue processing my data where required by law, regulatory obligation, or contractual necessity.
- iii. My request will be processed within **30 days** in accordance with the **NDP Act 2023**.

SECTION E: DECLARATION & SIGNATURE

I, _____ (**full name**), hereby withdraw my consent for the processing of my personal data by **CEVIANT ASSET MANAGEMENT LIMITED**, except where another lawful basis applies.

Signature/Thumbprint: _____

Date: _____

Submission Channel:

- By email: mezie.nwogu@ceviant.co
- By post/hand delivery: **CEVIANT ASSET MANAGEMENT LIMITED**
8A Bendel Close, Off Bishop Aboyade Cole Street, Victoria Island



DATA SUBJECT CONSENT FORM

DATA SUBJECT CONSENT FORM

CEVIANT ASSET MANAGEMENT LIMITED

Head Office: 8A Bendel Close, Off Bishop Aboyade Cole Street, Victoria Island

Email: mezie.nwogu@ceviant.co | **Phone:** +2347036773402

SECTION A: INTRODUCTION

In compliance with the **Nigeria Data Protection Act (NDP Act) 2023** and the **General Application and Implementation Directive (GAID) 2025**, **CEVIANT ASSET MANAGEMENT LIMITED** requires your explicit consent to collect, process, store, and/or share your personal data.

Your personal data will only be used for lawful purposes that are specific, legitimate, and necessary for the operations of our financial services.

SECTION B: CATEGORIES OF PERSONAL DATA COLLECTED

We may process the following personal data:

- Identification information (name, date of birth, gender, ID numbers).
- Contact details (address, phone number, email).
- Financial information (bank account, transaction history, credit details).
- Employment or business details (where applicable).
- Other information as required by regulators (e.g., NDPC, CBN, SEC, AML/KYC requirements).

SECTION C: PURPOSE OF DATA PROCESSING

Your personal data will be processed for the following purposes:

- i. Customer onboarding and KYC verification.
- ii. Loan applications, disbursement, and repayment management.
- iii. Regulatory reporting and compliance with CBN/NDPC directives.
- iv. Fraud detection, prevention, and risk management.
- v. Customer support and service delivery.
- vi. Marketing communication (where you provide consent).

SECTION D: CONSENT DECLARATION

- ☐ I hereby give **explicit consent** to **CEVIANT ASSET MANAGEMENT LIMITED** to collect, process, store, and share my personal data for the purposes outlined above.
- ☐ I understand that I have the right to **withdraw my consent at any time** without affecting the lawfulness of processing prior to withdrawal.
- ☐ I confirm that I have read and understood the **Privacy Policy** of **CEVIANT ASSET MANAGEMENT LIMITED**.

SECTION E: DATA SUBJECT RIGHTS

As a Data Subject, I understand I have the right to:

- Request access to my personal data.
- Request rectification or deletion of my data.
- Restrict or object to the processing of my data.
- Withdraw consent.
- Request portability of my data.
- Lodge a complaint with the **Nigeria Data Protection Commission (NDPC)** if I believe my rights are violated.

SECTION F: SIGNATURE

Full Name of Data Subject: _____

Signature/Thumbprint: _____

Date: _____



DATA SUBJECT ACCESS REQUEST (DSAR) FORM

DATA SUBJECT ACCESS REQUEST (DSAR) FORM

CEVIANT ASSET MANAGEMENT LIMITED

Head Office: No. 9, Alhaji Bashorun Street, Ikoyi, Lagos

Email: mezie.nwogu@ceviant.co | **Phone:** 07036773402

SECTION A: INTRODUCTION

Under the **Nigeria Data Protection Act (NDP Act) 2023** and the **GAID 2025**, you have the right to request access to the personal data we hold about you, and to exercise other rights including rectification, erasure, restriction, objection, and data portability.

This form enables you to formally submit your request.

SECTION B: DATA SUBJECT INFORMATION

Full Name: _____

Contact Address: _____

Phone Number: _____

Email Address: _____

Customer ID/Account Number (if applicable): _____

SECTION C: TYPE OF REQUEST

Please tick the applicable request(s):

- ☐ **Access** – I request a copy of the personal data you hold about me.
- ☐ **Rectification** – I request correction of inaccurate or incomplete data.
- ☐ **Erasure** – I request deletion of my personal data (“right to be forgotten”).
- ☐ **Restriction** – I request restriction of processing of my personal data.
- ☐ **Portability** – I request a copy of my data in a structured, commonly used format.
- ☐ **Objection** – I object to the processing of my data on lawful grounds.
- ☐ **Withdrawal of Consent** – I withdraw consent for certain processing activities.
- ☐ **Other (please specify):** _____

SECTION D: DETAILS OF REQUEST

(Please describe the information or processing activity you are requesting access to, or the action you want us to take.)

SECTION E: IDENTITY VERIFICATION

To protect your privacy, we require proof of identity before processing your request. Please attach one of the following:

- Valid government-issued ID (e.g., National ID, Driver's License, International Passport).
- Utility bill or bank statement (issued within the last 3 months).

SECTION F: ACKNOWLEDGEMENT

I understand that:

- This request will be processed within **30 days** in line with **NDP Act 2023**.
- If my request is complex, an extension (not exceeding 60 days) may be communicated to me.
- Some requests may be denied if restricted by law, regulation, or contractual obligations, in which case reasons will be provided.

SECTION G: DECLARATION & SIGNATURE

I, _____ (full name), hereby submit this Data Subject Access Request to **CEVIANT ASSET MANAGEMENT LIMITED**.

Signature/Thumbprint: _____

Date: _____

Submission Channel:

- Email: mezie.nwogu@ceviant.co
- Post/Hand delivery: CEVIANT ASSET MANAGEMENT LIMITED
8A Bendel Close, Off Bishop Aboyade Cole Street, Victoria Island.