TETRA

GOVERNANCE ADVISORY LIMITED

PRIVACY NOTICE

How we collect, use, and protect personal data

Effective date: 30 July 2026
Version 1.0
Owner: Data Protection Officer, Tetra Governance Advisory Limited

1. Introduction

Tetra Governance Advisory Limited ("Tetra", "we", "us", or "our") is a governance advisory firm providing corporate governance solutions.

This Privacy Notice explains how we collect, use, share, retain, and protect personal data belonging to our clients, their directors and board members, our employees and job applicants, whistleblowers who use our reporting channels, website visitors, and other individuals we interact with in the course of our business. It applies whether that data is collected in person, by phone, in writing, through our website, or through any digital platform we use to deliver our services.

Tetra is committed to processing personal data lawfully, fairly, and transparently, in accordance with the Nigeria Data Protection Act, 2023 ("NDPA"), the Nigeria Data Protection Commission's ("NDPC") General Application and Implementation Directive, and, where applicable to specific engagements, other relevant data protection laws.

2. Who We Are

Tetra Governance Advisory Limited is the data controller in respect of the personal data described in this Notice, except where we are expressly engaged as a data processor on behalf of a client (for example, where we manage a client's whistleblowing hotline or maintain a client's statutory register), in which case the client remains the controller and we process data strictly on their documented instructions, under a data processing agreement.

Registered name	Tetra Governance Advisory Limited
Registered office	30, Furo Ezimora Street Lekki, Lagos, Nigeria
Email	info@tetragovernance.ng
Data Protection	Damilola Tunji-Gbesan
Website	www.tetragovernance.ng

3. Scope of This Notice

This Notice applies to personal data we process in relation to:

- Clients and prospective clients, including their directors, shareholders, company secretaries, and authorised representatives.
- Individuals whose data we process on a client's behalf while delivering our services.
- Whistleblowers and other individuals who make or are named in reports through whistleblowing channels we administer.
- Participants in any of our webinars (recorded or otherwise).
- Job applicants, employees, contractors, and consultants of Tetra.
- Visitors to our website and recipients of our marketing communications.
- Suppliers, vendors, and other third parties we engage in the course of business.

This Notice does not form part of any contract we have with clients or suppliers and may be updated from time to time in accordance with Section 18 below.

4. Personal Data We Collect

The personal data we collect depends on the nature of our relationship with you and the specific governance service being delivered. This may include:

a. Information you provide to us

We collect personal information about prospective clients and their beneficial owners or controllers as part of business development initiatives and our business acceptance process. This includes, but is not limited to, your Personal Data such as your full name, nationality, phone number(s), email address, date of birth, home or office addresses, location, business interest and employment history.

b. Corporate information

Where applicable, we may also collect information about companies, such as your company registration number, Tax Identification Number, sector of business, office address, details of your contracts, incorporation documents, signatures, confidential correspondences, photographs among others. This information is collected to provide our services or fulfill our contractual obligation.

c. Information collected automatically

This includes but is not limited to your IP address, browser type, mobile device ID, device type, operating system version, connection information, mobile network information, location derived from GPS-enabled services, information based on your usage of the service such as time, date and duration of your use, referral URLs, search terms and search history, browsing history and advertisement interactions.

5. How We Collect Your Data

- Directly from you, e.g. during onboarding, engagement scoping, board meetings, interviews, or whistleblowing reports.
- From our clients, e.g. company registers, HR records, board packs, risk registers, and organisational charts shared for the purpose of our engagement.
- From publicly available sources, e.g. corporate registries, press releases, and regulatory filings, for due diligence and governance benchmarking.
- From third parties, e.g. background screening providers, referees, and regulators.
- Automatically, e.g. through cookies and analytics tools when you visit our website (see Section 16).

6. Why We Use Your Data and Our Legal Basis

We collect your information to ensure your easy and seamless access to our services. We use the information we collect for the following purposes:

i. We collect your information to ensure your easy and seamless access to our services.

ii. To analyze and understand your use of our products and services.

iii. To protect against illegal, malicious, and fraudulent activity.

iv. To analyze and improve the quality of our services and offerings.

v. To facilitate your interactions with our social media platforms.

vi. To analyze and learn about our users' demographics, interests, and behavior.

vii. To identify and repair errors and bugs on our websites.

viii. To facilitate dissemination of information about our services and our partners.

ix. To consider your application for a position at our Company and as part of our recruitment process

7. Whistleblowing Data: Additional Safeguards

Where Tetra administers a whistleblowing or ethics hotline (either as our own service to clients across the sectors we serve, or on a client's behalf as a processor), we apply additional safeguards given the sensitivity of this data:

i. Reports may be made anonymously where the reporting channel supports this; we do not attempt to identify anonymous reporters.

ii. Access to whistleblowing case data is restricted to a limited number of authorised personnel on a need-to-know basis.

iii. We do not disclose the identity of a reporter to the person the report concerns, except where required by law, a court or regulator, or necessary for a fair investigation and the reporter has been informed of this possibility.

iv. Reports made in good faith, even if later found to be inaccurate, do not expose the reporter to retaliation; we require clients to maintain non-retaliation protections.

v. Whistleblowing case files are retained only for as long as necessary to investigate, remediate, and address any related legal, regulatory, or disciplinary process (see Section 12).

8. Automated Decision-Making

We do not use fully automated decision-making, including profiling, that produces legal or similarly significant effects on individuals without human involvement. Where analytics or scoring tools support risk, ESG, etc., outputs are reviewed and finalised by our advisory team before being shared with clients.

9. How We Share Your Data

We may share personal data with:

i. The client engages us, where data is collected or generated in the course of a specific advisory engagement.

ii. Regulators and statutory bodies, where legally required.

iii. Professional advisers, including lawyers, auditors, and insurers, where necessary to obtain advice or manage risk.

iv. Service providers who support our operations, such as IT hosting, document management, background screening, and payroll providers, under contractual confidentiality and data protection obligations.

v. Law enforcement or courts, where required by law or to establish, exercise, or defend legal claims.

We do not sell personal data. We do not share personal data with third parties for their own independent marketing purposes without your consent.

10. International Data Transfers

Where an engagement involves a client, affiliate, or service provider located outside Nigeria, we ensure the transfer complies with the NDPA's cross-border transfer requirements, which may include verifying that the receiving country offers an adequate level of protection, putting in place standard contractual clauses or binding corporate rules, or relying on another safeguard recognised by the NDPC.

11. Data Retention

We retain personal data only for as long as necessary to fulfil the purposes described in this Notice, including to satisfy any legal, regulatory, accounting, or reporting requirements. Where data is no longer required, we securely delete, anonymise, or destroy it in accordance with our internal records retention and disposal schedule.

12. How We Protect Your Data

We maintain technical and organisational measures appropriate to the sensitivity of the personal data we hold. We use strict procedures and security features to prevent unauthorized access. We also take all steps reasonably

necessary to ensure that your data is treated securely and in accordance with this privacy notices. In the event of a personal data breach that poses a risk to individuals, we will notify the NDPC and affected individuals in accordance with the NDPA's breach notification requirements.

13. Your Rights

Subject to applicable law and any exemptions that may apply, you have the right to:

- Be informed about how your personal data is processed.
- Access a copy of the personal data we hold about you.
- Request correction of inaccurate or incomplete personal data.
- Request erasure of your personal data, where applicable.
- Object to, or request restriction of, certain processing, including direct marketing.
- Request data portability, where technically feasible.
- Withdraw consent at any time, where processing is based on consent, without affecting the lawfulness of processing before withdrawal.
- Lodge a complaint with the Nigeria Data Protection Commission or another competent supervisory authority.

To exercise any of these rights, please contact our Data Protection Officer using the details in Section 2. We will respond within the timeframe required by the NDPA and may request proof of identity before acting on a request.

14. Children's Privacy

Our services are directed at businesses and professionals, and we do not knowingly collect personal data from children. Where a client's records incidentally include data relating to a minor, we apply additional care and limit processing to what is strictly necessary.

15. Marketing Communications

We may send you information about our governance and compliance insights relevant to your sector where you have consented, or where you are an existing client and have not opted out. You may unsubscribe at any time using the link in our communications or by contacting us directly.

16. Cookies and Website Tracking

Our website uses cookies and similar technologies to operate essential functions, understand site usage, and improve user experience. Non-essential cookies (such as analytics and marketing cookies) are only set with your consent, which you can manage through our cookie banner or your browser settings. For more detail, see our separate Cookie Notice, available on our website.

17. Third-Party Links

Our website and reports may contain links to third-party websites or resources, including client or partner websites across the sectors we serve. We are not responsible for the privacy practices of these third parties and encourage you to review their privacy notices separately.

18. Changes to This Notice

We may update this Privacy Notice from time to time to reflect changes in our practices, services, or legal requirements. The "Effective date" at the top of this Notice indicates when it was last revised. Material changes will be communicated to clients and, where appropriate, published on our website.

19. How to Contact Us

If you have questions about this Privacy Notice or how we handle personal data, please contact:

Data Protection Officer, Tetra Governance Advisory Limited

Email: info@tetragovernance.com

Address: 30 Furo Ezimora Street Lekki, Lagos

20. Right to Lodge a Complaint

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

- Website: www.ndpc.gov.ng
- Address: Nigeria Data Protection Commission, Abuja, Nigeria

This is without prejudice to your right to seek a remedy through the courts.