

PRIVACY POLICY

OPAL LEGAL

This Privacy Policy explains how Opal Legal ("the Firm", "we", "us", or "our") collects, uses, stores, processes, discloses, and protects personal data when you access or use our website, consult with our attorneys, engage our legal services, or otherwise interact with us through any digital or physical channel (collectively, the "Services"). This Policy is drafted in compliance with the Nigeria Data Protection Act 2023 ("NDPA"), the Nigeria Data Protection Regulation 2019 ("NDPR"), and other applicable data protection laws and regulations in the Federal Republic of Nigeria.

By accessing our website or engaging our Services, you acknowledge that you have read, understood, and agree to the collection and use of information in accordance with this Privacy Policy. If you do not agree with the terms of this Policy, please discontinue use of our Services.

1. INTRODUCTION AND IDENTITY OF DATA CONTROLLER

Opal Legal is a law firm duly registered and operating under the laws of the Federal Republic of Nigeria. As a data controller, we are responsible for determining the purposes and means by which personal data is processed in connection with our Services.

We are committed to maintaining the highest standards of privacy, confidentiality, and data protection. In addition to our obligations under applicable data protection law, we are also bound by the rules of professional conduct applicable to legal practitioners in Nigeria, which impose strict duties of confidentiality in relation to client information.

This Policy applies to all individuals whose personal data we process, including prospective clients, current and former clients, website visitors, business contacts, and third parties whose personal data is provided to us in connection with our Services.

2. PERSONAL DATA WE COLLECT

Depending on the nature of your engagement with us, we may collect and process the following categories of personal data:

- (a) Identity and Contact Information: Full name, date of birth, gender, nationality, residential address, email address, telephone number, and other identifying details.
- (b) Professional and Business Information: Employer name, job title, company registration details, business address, and professional credentials.
- (c) Financial Information: Bank account details, billing address, payment history, and transaction records necessary for billing and fee management purposes.
- (d) Identification Documents: Government-issued identification such as national identity cards, international passports, driver's licences, voter identification cards, and corporate registration documents, where required for client onboarding and Know Your Customer ("KYC") compliance.
- (e) Legal Matter Information: Facts, documents, correspondence, and other information relating to your legal matter or transaction that you share with us in the course of our engagement.
- (f) Technical and Usage Data: IP addresses, browser type and version, operating system, pages visited, time spent on pages, referring URLs, device identifiers, and other technical data automatically collected when you use our website.

- (g) Communications Data: Records of emails, phone calls, and other correspondence between you and the Firm.
- (h) Consent Records: Records of any consents you have given to us, including timestamps and the specific purposes for which consent was given.

Where you provide personal data relating to third parties (such as opposing parties, witnesses, or other individuals connected to your matter), you represent that you have the authority to do so and that such individuals have been made aware of, or have consented to, such disclosure as required by applicable law.

3. HOW WE COLLECT PERSONAL DATA

We collect personal data through the following means:

- (a) Directly from you: When you submit an enquiry through our website contact form, engage our legal services, sign an engagement letter, attend consultations (in person or virtually), send us correspondence, or otherwise voluntarily provide information to us.
- (b) Automatically: When you visit our website, we may automatically collect technical data through cookies, web beacons, server logs, and similar tracking technologies.
- (c) From third parties: We may receive personal data about you from other parties in connection with your legal matter, including opposing solicitors, courts, regulators, government agencies, or third-party service providers who assist us in delivering our Services.
- (d) From publicly available sources: We may collect information that is publicly available, such as from the Corporate Affairs Commission ("CAC") registry, court records, or publicly accessible professional directories.

4. PURPOSES OF PROCESSING

We process personal data for the following purposes:

- (a) Providing Legal Services: To advise on, prepare, and manage legal matters, transactions, disputes, and proceedings on your behalf.
- (b) Client Onboarding and KYC: To verify your identity and carry out due diligence in accordance with applicable anti-money laundering ("AML") and counter-terrorism financing ("CTF") laws and regulations.
- (c) Billing and Payments: To issue invoices, process payments, manage accounts, and recover outstanding fees.
- (d) Communication: To respond to enquiries, provide updates on your matter, and send you relevant legal information, newsletters, or alerts where you have requested them or consented to receive them.
- (e) Legal Compliance: To comply with our obligations under applicable Nigerian law, regulatory requirements, court orders, and directions from competent authorities.
- (f) Conflict Checking: To check for potential conflicts of interest before accepting new instructions.
- (g) Risk Management: To assess and manage legal, financial, and reputational risk to the Firm and our clients.
- (h) Website Operation and Improvement: To operate, maintain, secure, and improve the functionality and performance of our website.
- (i) Analytics: To analyse patterns of website usage and service engagement to improve our offerings.

(j) Legal Claims: To establish, exercise, or defend legal claims involving the Firm.

5. LEGAL BASIS FOR PROCESSING

We process personal data on one or more of the following legal bases as provided under the Nigeria Data Protection Act 2023:

- (a) Consent: Where you have freely given, specific, informed, and unambiguous consent to the processing of your personal data for one or more specific purposes. You may withdraw consent at any time without prejudice to the lawfulness of processing based on consent prior to withdrawal.
- (b) Performance of a Contract: Where processing is necessary for the performance of a contract to which you are a party, or in order to take steps at your request prior to entering into a contract.
- (c) Legal Obligation: Where processing is necessary for compliance with a legal obligation to which the Firm is subject, including obligations under Nigerian tax law, AML/CTF legislation, and professional regulations.
- (d) Legitimate Interests: Where processing is necessary for the purposes of the legitimate interests pursued by the Firm, provided such interests are not overridden by your fundamental rights and freedoms. Our legitimate interests include managing conflicts of interest, ensuring the security of our systems, and maintaining professional records.
- (e) Vital Interests: In exceptional circumstances, where processing is necessary to protect your vital interests or those of another natural person.

6. DISCLOSURE OF PERSONAL DATA

We may share personal data with the following categories of recipients, strictly on a need-to-know basis and subject to appropriate confidentiality obligations:

- (a) Counsel and External Solicitors: Other legal practitioners engaged to assist on your matter, subject to professional confidentiality obligations.
- (b) Service Providers: Third-party vendors who provide IT, cloud hosting, document management, payment processing, and other support services to the Firm, who are contractually bound to process data only on our instructions.
- (c) Courts and Tribunals: Where necessary to initiate, conduct, or defend legal proceedings.
- (d) Regulatory and Government Authorities: The Nigerian Bar Association, the Federal Inland Revenue Service, the Special Control Unit against Money Laundering ("SCUML"), the Financial Reporting Council, and other regulators, where required by law.
- (e) Professional Advisers: Auditors, insurers, and other professional advisers engaged by the Firm.
- (f) Counterparties: Opposing parties and their representatives in legal transactions or disputes, to the extent necessary to conduct your matter.

We do not sell, rent, or trade personal data to any third party for commercial or marketing purposes. Any disclosure to third parties is made on the basis of a legitimate legal purpose and, where applicable, subject to data processing agreements that ensure adequate protection of personal data.

7. CROSS-BORDER DATA TRANSFERS

Where it becomes necessary to transfer personal data outside Nigeria, for example in connection with international legal matters or the use of cloud-based technology services, we shall ensure that such

transfers are made in accordance with the requirements of the Nigeria Data Protection Act 2023 and applicable regulations, including by ensuring that adequate safeguards are in place to protect the transferred data.

You will be notified of any cross-border transfer of your personal data where required by applicable law, and such transfers shall only be made to jurisdictions that afford adequate protection or on the basis of appropriate contractual safeguards.

8. DATA RETENTION

We retain personal data only for as long as is necessary to fulfil the purposes for which it was collected, or as required or permitted by applicable law and professional regulations. The applicable retention periods depend on the nature of the data and the purpose of processing. As a general guide:

- (a) Client files and legal matter records: Retained for a minimum of seven (7) years from the date of closure of the matter or termination of the engagement, in accordance with applicable professional rules and statutory limitation periods.
- (b) Financial and billing records: Retained for a minimum of seven (7) years from the date of the relevant transaction, as required under applicable tax and financial regulations.
- (c) KYC and identity verification records: Retained for a minimum of five (5) years from the end of the business relationship, as required under AML/CTF regulations.
- (d) Website technical data: Retained for a reasonable period necessary for security and analytics purposes, not exceeding twelve (12) months unless required for longer by law.

Where personal data is no longer required for any lawful purpose, it shall be securely and permanently deleted or irreversibly anonymized. Physical records containing personal data shall be disposed of by secure means.

9. DATA SECURITY

We implement appropriate technical and organisational measures designed to protect personal data against accidental or unlawful destruction, loss, alteration, unauthorised disclosure, or access. These measures include:

- (a) Encryption of data in transit and, where appropriate, at rest;
- (b) Access controls limiting access to personal data to authorised personnel only;
- (c) Regular security assessments and vulnerability testing;
- (d) Staff training on data protection and information security;
- (e) Physical security measures for our premises and paper-based records;
- (f) Incident response procedures to manage and report data breaches in accordance with applicable law.

Notwithstanding the foregoing, no method of electronic transmission or storage is entirely secure. We cannot guarantee the absolute security of personal data transmitted over the internet. In the event of a data breach that is likely to result in a risk to your rights and freedoms, we will notify you and the relevant supervisory authority as required under the NDPA.

10. YOUR RIGHTS AS A DATA SUBJECT

Subject to applicable legal limitations, you have the following rights with respect to your personal data under the Nigeria Data Protection Act 2023:

- (a) **Right of Access:** The right to obtain confirmation as to whether we process personal data concerning you, and to receive a copy of such data.
- (b) **Right to Rectification:** The right to request the correction of inaccurate or incomplete personal data.
- (c) **Right to Erasure:** The right to request the deletion of your personal data where there is no compelling reason for its continued processing.
- (d) **Right to Restriction:** The right to request that we restrict the processing of your personal data in certain circumstances.
- (e) **Right to Data Portability:** The right to receive your personal data in a structured, commonly used, and machine-readable format, and to transmit it to another controller where technically feasible.
- (f) **Right to Object:** The right to object to processing based on our legitimate interests or for direct marketing purposes.
- (g) **Right to Withdraw Consent:** Where processing is based on consent, the right to withdraw consent at any time without affecting the lawfulness of prior processing.
- (h) **Right to Complain:** The right to lodge a complaint with the Nigeria Data Protection Commission ("NDPC") if you believe your rights under the NDPA have been infringed.

To exercise any of the above rights, please submit a written request to us using the contact details provided in Section 14 of this Policy. We will respond to your request within a reasonable timeframe and in accordance with applicable law. We may be required to verify your identity before processing your request.

Please note that certain rights are subject to exceptions. For example, we may be entitled to retain data where required by law or professional obligations, or where necessary to defend legal claims.

11. COOKIES AND TRACKING TECHNOLOGIES

Our website uses cookies and similar tracking technologies to enhance your browsing experience, analyse website traffic, and improve our online services. Cookies are small text files placed on your device when you visit our website.

We may use the following categories of cookies:

- (a) **Strictly Necessary Cookies:** Essential for the website to function properly. These cannot be disabled.
- (b) **Performance and Analytics Cookies:** Used to collect information about how visitors use our website, helping us improve its functionality.
- (c) **Functional Cookies:** Enable enhanced functionality and personalisation.
- (d) **Marketing Cookies:** Used to deliver relevant advertisements and track the effectiveness of marketing campaigns.

You may control or disable non-essential cookies through your browser settings. Please note that disabling certain cookies may affect the functionality of our website. Where required by applicable law, we will obtain your consent before placing non-essential cookies on your device.

12. THIRD-PARTY LINKS AND SERVICES

Our website may contain links to third-party websites, social media platforms, or online services. We are not responsible for the privacy practices, content, or data handling policies of such third parties. We encourage you to review the privacy policies of any third-party services you access through links on our website before providing your personal data to them.

13. CHILDREN'S DATA

Our website and Services are not directed at or intended for use by individuals under the age of 18 years. We do not knowingly collect personal data from minors. If we become aware that we have inadvertently collected personal data from a person under the age of 18 without appropriate parental or guardian consent, we will take immediate steps to delete such data. If you believe that we may have collected personal data from a minor, please contact us immediately using the details in Section 14 below.

14. CHANGES TO THIS PRIVACY POLICY

We reserve the right to update or modify this Privacy Policy at any time to reflect changes in applicable law, our data processing practices, or the nature of our Services. Any material changes to this Policy will be posted on our website with an updated effective date. Where required by law, we will notify affected individuals of significant changes.

Your continued use of our website or Services following the posting of any changes constitutes acceptance of the updated Privacy Policy. We encourage you to review this Policy periodically.

15. CONTACT INFORMATION AND DATA PROTECTION ENQUIRIES

If you have any questions, concerns, or requests regarding this Privacy Policy, the processing of your personal data, or the exercise of your data subject rights, please contact us at:

Law Firm: Opal Legal

Email: youropallegal@gmail.com

Address: Lagos, Nigeria

Telephone: 09039784488

We will endeavour to respond to all enquiries within a reasonable time and in compliance with our obligations under the Nigeria Data Protection Act 2023.

Effective Date: 13th April 2026

Last Reviewed: 21st April 2026