#### NPF MICROFINANCE BANK PLC PRIVACY POLICY

# **Privacy & Terms**

### We Value your privacy

This privacy Statement relates solely to information supplied by you on this website. At NPF Microfinance Bank Plc (hereinafter called "NPF MFB") we treat your personal information as private and confidential.

This Policy sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. Please read the following carefully to understand our views and practises regarding your personal data and how we will treat it. By continuing to visit our website and other NPF MFB customer touch points, you accept and consent to the practises described in this policy.

NPF Microfinance Bank Plc is your data controller and is responsible for processing your personal information described in this Privacy Policy. NPF Microfinance Bank Plc uses the personally identifiable information you provide to communicate with you in response to your enquiries, to provide the services you request, and to manage your account. Any personally identifiable information gathered by NPF Microfinance Bank Plc will be used for these purposes only. We will not disclose or divulge such data outside of NPF Microfinance Bank Plc, other than to third party providers that assist us in providing the services. NPF Microfinance Bank Plc does not share, sell, rent or trade personally identifiable information with third parties for their promotional purposes.

### How do we collect information?

We may collect information from a range of sources and it may relate to any of our products or services we currently provide or may have provided in the past.

We collect personal information when;

- a. You open an account or perform transactions such as make deposits or withdrawal from your account, payment history and transaction records.
- b. You apply for a loan or use your credit or debit card.
- c. You seek information from our customer service provider, information concerning complaints and disputes.
- d. We seek information about your credit history from credit bureau.
- e. You provide account information such as your personal details e,g, name, gender, date and place of birth; contact information such as address, email address and mobile numbers
- f. You provide information concerning your identity e.g. Photo ID, Passport information, National ID Card and nationality
- g. You use your login credentials for online banking and mobile banking apps.
- h. We conduct necessary investigations i.e. due diligence checks and AML/CFT checks and obtain information that we need to support our regulatory obligations e.g.

information about transaction details, detection of any suspicious and unusual activities

## **Use of your Personal Information:**

NPF Microfinance Bank Plc will process your personal information for the following purposes.

- i. To offer and provide our products and services tailored to meet your unique needs.
- ii. To fulfil the terms of any service contract(s) you might have with us.
- iii. To improve your service experience with us
- iv. To conduct our business
- v. To manage our relationship with you.
- vi. To comply with Laws and Regulations
- vii. To provide information to Credit Agencies
- viii. To update your records
- ix. To develop statistics as may be required
- x. To comply with our Internal Policies
- xi. To communicate with you when necessary

NPF Microfinance Bank Plc will limit the collection and use of your personal information for the stated purposes.

#### Your consent

You consent to the processing of your Personal Data when you access our platforms, or use our services, content, features, technologies or functions offered on our website or other digital platforms. You can withdraw your consent at any time but such withdrawal will not affect the lawfulness of processing based on consent given before its withdrawal.

We will only disclose your personal information if:

- the law requires it;
- we have a public duty to disclose the information;
- our or your legitimate interests require disclosure; or
- ❖ You agreed that we may disclose your information.

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# **How we protect your information**

We take appropriate technical and organizational measures to prevent loss, unauthorized access, misuse, modification or disclosure of information under our control. This may include the use of encryption, access controls and other forms of security to ensure that your data is protected. We require all parties including our staff and third-parties processing data on our behalf to comply with relevant policies and guidelines to ensure confidentiality and that information is protected in use, when stored and during transmission.

Where we have provided you (or where you have chosen) a password which grants you access to specific areas on our site, you are responsible for keeping this password

confidential. We request that you do not to share your password or other authentication details with anyone.

### **Information Protection and Retention**

NPF MFB will always ensure that your personal information is adequately protected against unauthorised access. We have put in place processes and technologies to ensure that your personal information is not modified, lost, damaged or destroyed. Our people are trained to ensure that your personal information is not disclosed and safe as stated in this policy.

Where access and use of our electronic platforms requires authentication of the user, you shall be responsible for the use and safety of your authentication credentials(s) including but not limited to User Name, Personal Identification Number (PIN), Password, One Time Passwords (OTP) AND Tokens. We will retain your personal information for such length of time as may be required by law, regulation, and the internal policies of NPF Microfinance Bank Plc.

## **Where We Store Your Information**

All Personal Information you provide to us is stored on our secured servers as well as secured physical locations and cloud infrastructure (where applicable). Whenever your information is transferred to another location, we will take all necessary steps to ensure that your data is handled securely and in accordance with this privacy policy.

### **How Long We Store Your Information**

We retain your data for as long as is necessary for the purpose(s) that it was collected. Storage of your data is also determined by legal, regulatory, administrative or operational requirements. We only retain information that allows us comply with legal and regulatory requests for certain data, meet business and audit requirements, respond to complaints and queries, or address disputes or claims that may arise.

Data which is not retained is securely destroyed when it is identified that it is no longer needed for the purposes for which it was collected.

### **Your Rights**

**The Right to be informed:** To emphasise the need for transparency over the usage of personal data, we ensure fair processing of information typically through this privacy policy.

The Right to Access: Individuals have right to access information the Bank holds, access their personal data and other supplementary information and obtain information about how we process it.

The Right to Restrict Processing: Individuals have a right to "block" or withdraw their consent to our processing of your information, which you can do at any time. When processing is restricted, we are permitted to store the personal data, but not further process it.

The Right to Rectification: Individuals are entitled to have personal data rectified if it is inaccurate or incomplete. If this personal data in question has been disclosed to third parties, they must be informed of the rectification where possible. The Bank must also inform the individuals about the third parties to whom the data has been disclosed where appropriate.

**The Right to Erasure:** Individuals have the right to request the deletion or removal of personal data where there is no compelling legal or regulatory requirement for its continued processing. The Bank will ensure that the right is protected.

The Right to Data Portability: We will ensure that personal data is moved, copied or transferred easily from one IT environment to another in a safe and secure way without hindrance to usability.

The Right to Object: Individuals have the right to object to our processing of their information in some circumstances.

#### **Cookies**

In order to improve our Internet service to you, we will occasionally use a "cookie" and/or other similar files or programs which may place certain information on your computer's hard drive when you visit our website.

A cookie is a small amount of data that our web server sends to your web browser when you visit certain parts of our site. We may use cookies to:

- i. Allow us to recognise the PC you are using when you return to our website so that we can understand your interest in our website and tailor its content and advertisements to match your interests (This type of cookie may be stored permanently on your PC but does not contain any information that can identify you personally).
- ii. Identify you after you have logged in by storing a temporary reference number in the cookie so that our web server can conduct a dialogue with you while simultaneously dealing with other customers. (Your browser keeps this type of cookie until you log off or close down your browser when these types of cookie are normally deleted. No other information is stored in this type of cookie).
- iii. Allow you to carry information across pages of our site and avoid having to re-enter that information.
- iv. Allow you access to stored information if you register for any of our on-line services.
- v. Enable us to produce statistical information which helps us to improve the structure and content of our website.
- vi. Enable us to evaluate the effectiveness of our advertising and promotions.

Cookies do not enable us to gather personal information about you unless you give the information to our server. Most Internet browser software allows the blocking of all cookies or enables you to receive a warning before a cookie is stored. For further information, please refer to your Internet browser software instructions or help screen.

#### **Individual Responsibility**

Individuals are responsible for making sure the information provided to the Bank is accurate and should inform the Bank of any changes as it occurs, this will enable us to update your information with us.

## **Update to this Privacy Policy**

This policy may be revised to reflect the legal, regulatory and operating environment and such revised versions will automatically become applicable to you. We will post any revisions we make to our Privacy Policy on this page and such revised policy becomes effective as at the time it is posted. We also encourage you to check this page from time to time for updates to this policy.

# **Indemnity**

This Indemnity shall be a continuing obligation in respect of all matters connected to or arising from the Bank processing such transactions. This Indemnity shall remain valid and in full force from the date of its execution hereof until the Bank issues a letter discharging me from my obligations herein. This indemnity shall be construed in accordance with the laws of the Federal Republic of Nigeria.

#### Contact

Questions, comments, and requests regarding this privacy policy are welcomed and should be addressed to <a href="mailto:info@npfmicrofinancebankplc.ng">info@npfmicrofinancebankplc.ng</a>. Kindly contact our Data Protection Officer for more details on <a href="mailto:dpo@npfmicrofinancebankplc.ng">dpo@npfmicrofinancebankplc.ng</a>. Or 08131277929