

# FirstBank Privacy Policy

## Your Privacy First

At First Bank of Nigeria Limited (FirstBank) and/or its Subsidiaries (FBNBank), we put you first and are thus committed to protecting and respecting your privacy. We are committed to being transparent about how we collect, process, share and manage data about you (our customers and other natural persons where applicable).

### 1. The Bank and You

This Privacy Policy stipulates the bank's approach to handling your data and your rights with regards to our collection, use, storage and sharing of your personal data which may be collected by FirstBank and/or FBNBank in the course of providing you with exceptional products and services, collectively referred to herein as First Bank's "services", across all our delivery channels to meet your needs.

The subsidiaries of FirstBank covered by this Policy are;

- i. FBN Bank (Ghana) Limited
- ii. FBN Bank (Guinea) Limited
- iii. FBN Bank (Senegal) Limited
- iv. FBN Bank (Sierra Leone) Limited
- v. FBN Bank (DRC) Limited
- vi. FBN Bank (Gambia) Limited
- Vii. First Pension Custodian Nigeria Limited

### 2. Your Personal Information

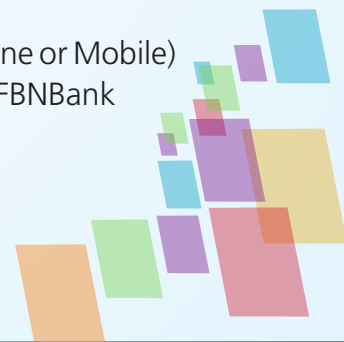
In the course of consuming services provided to you by FirstBank and/or FBNBank to meet your needs, through this and other channels available, we collect information you provide us via forms, phone calls, and correspondence by mail or emails, service point interfaces, as well as other channel enablers as might be available. The information we collect may include but not limited to: identity verification, services consumed, and services desired/required, mode of consumption, preferences, location, general events, instructions and transactions relating to the services.

We may also use information about you collected by third parties and other service partners to provide better serve your needs. Third party sources are not controlled by First Bank or FBNBank and as such are not liable for how they use it.

### 3. Consent

We don't ask for your personal information unless we need it to provide or improve our products and services for you. We want to be sure we have your consent to collect, use and, where necessary, share your information with our partners and suppliers that help us serve you. Whenever we introduce new services and technologies, we'll ensure you understand and agree to any new ways in which your information is handled. You will be considered to have given your consent to FirstBank and/or FBNBank for the processing of your personal data when;

- I. You complete any form, brochure or material issued by FirstBank and/or FBNBank at any of our service points (mobile, online, in-branch etc.) requesting for such personal information
- ii. You register, check or tick the acceptance box on any of our electronic platforms (Online or Mobile) relating to terms and conditions of any service or product offered by FirstBank and/or FBNBank
- iii. You send a request, complaint or other communication to FirstBank and/or FBNBank



iv. You use any service or product offered by FirstBank and/or FBNBank

#### **4. Use of Your Information**

FirstBank and/or FBNBank will process your personal information for the following purposes;

- To offer and provide our Products and Services tailored to meet your unique needs
- To fulfil the terms of any service contract(s) you might have with us
- To improve your service experience with us
- To conduct our business
- To manage our relationship with you
- To comply with Laws and Regulations
- To provide information to Credit Agencies
- To update your records
- To develop statistics as may be required
- To comply with our Internal Policies
- To communicate with you when necessary

FirstBank and/or FBNBank will limit the collection and use of your personal information for the stated purposes.

#### **5. Cookies**

Please note that for our digital channels, we may collect information about your computer (or mobile device), including where available or necessary your IP address(es), operating system and browser type for system administration or for our own commercial purposes. This is statistical data about our users' browsing actions and patterns and does not identify any individual. Further details can be found in our Cookie's policy

#### **6. Information sharing and Disclosure**

FirstBank and/or FBNBank will not sell or rent your personally identifiable information to anyone. FirstBank and/or FBNBank may share or disclose your personal information to third parties where:

- i. We have your consent to share or disclose such personal information;
- ii. We are required by law to share or disclose such personal information
- iii. We respond to subpoenas, court orders or other legal processes;
- iv. We find that your actions on our electronic platforms violate any of our Policies for the purpose of investigations, reporting and enforcing any of our rights.
- v. Required for audit purposes

FirstBank and/or FBNBank may use and share your personal information with its affiliates and members of FBN Holdings Plc for providing services and service-related activities such as collecting subscription fees for such services, notifying or contacting you regarding any problem with, or the expiration of such services. In this regard, the Affiliates and members of FBN Holdings Plc shall process the information as provided in this Privacy Policy.

FirstBank and/or FBNBank may also disclose or share your personal information where it is necessary to enforce the terms and conditions of any of our Products and Services or any of our rights as well as to protect our operations and customers.

#### **7. Information Protection and Retention**

FirstBank and FBNBank will always ensure that your personal information is adequately protected. 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 credential(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, the internal policies of FirstBank and/or FBNBank.



## 8. Your Rights Under This Policy

The following rights are available to you under this Policy:

- i. You may at any time request for access to your personal information held by FirstBank and/or FBNBank or request that your personal information be made available to a third party. Your request may specify the format in which the information should be made available subject to FirstBank and/or FBNBank having the capacity to provide the personal information in the requested format.
- ii. You may request to update your personal information with FirstBank and/or FBNBank at any time.
- iii. You may elect to withdraw your consent at any time. Save where there is a legal or operational reason to continue with the processing of your personal data, FirstBank and/or FBNBank shall discontinue the processing of your personal data upon receipt of your notice withdrawing consent. Such withdrawal however may impact FirstBank and/or FBNBank's ability to provide some products or services to you if your consent is mandatory for the execution for providing such services.
- iv. Your right to withdraw consent extends to objecting or restricting the processing of your personal data by FirstBank and/or FBNBank
- v. You may request that your personal information be deleted. We may continue to retain such personal information as may be required for compliance with legal, regulatory or policy requirements.

## 9. Remedies

Where you have concerns relating to the processing of your personal information by FirstBank and/or FBNBank, or require any clarification on this policy, please notify us through or contact details provided below: Email: [firstcontact@firstbanknigeria.com](mailto:firstcontact@firstbanknigeria.com). We will respond to your concerns within 30 days of receiving your notice.

## UPDATES TO THIS PRIVACY POLICY

We may update this policy from time to time. Where there are changes in the way we use your personal information we will notify you by posting a prominent notice on our website.

