

## DATA PROTECTION STATEMENT

### INTRODUCTION

To provide you (the "Customer") with our products and services, we need to collect, record, use, share and store personal and financial information about you ("**Information**"). Your Information may include Personal Data and Sensitive Personal Data as defined in the Nigeria Data Protection Regulation 2019 ("**NDPR**") (as may be amended, replaced or re-enacted from time to time) and any other law or regulation governing Data Protection.

### RESPONSIBILITY FOR YOUR INFORMATION

Our use of your information is governed by the applicable laws and regulation, and we, **FIRST BANK OF NIGERIA LIMITED ("FirstBank" or "We" or "Us" or "the Bank")** are the Data Controller in respect of such information.

### YOUR INFORMATION

This includes information which is:

- a. obtained from you or from third parties, such as employers, joint account holders, credit reference agencies (who may search the electoral register), fraud prevention agencies, intermediaries who refer you to us and who have collected your information from you as part of that referral process, intermediaries who facilitate communication of information relating to your account between us and you, or other organizations or other parties associated with you, when you apply for an account or any other product or service, or which you or they give to us at any other time; or
- b. obtained from the way you use and manage your account(s), from the transactions you make such as the date, amount, currency and the name and type of supplier (e.g. supermarket services, medical services, retail services) and from the payments which are made to your account.

You will be considered to have given your consent to us for the processing of your Personal Data and Sensitive Personal Data when you sign this form or indicate your acceptance of its terms.

### HOW YOUR INFORMATION IS PROCESSED

We will process your Information including your Personal Data and Sensitive Personal Data on the terms detailed below;

- A. We and other companies in the FBN Holdings Plc Group will use your information: to manage your account(s), give you statements, provide our products and services, for assessment and analysis purposes (including credit and behavioral scoring and market and product analysis), for administration purposes, to prevent and detect fraud, money laundering and other criminal or prohibited activity, to carry out regulatory checks, meet our obligations to any relevant legal or regulatory authority and to develop and improve our services to you and other customers and protect our interests.
- B. Where you provide personal and financial information relating to others (e.g. dependents, employees, third parties or joint account holders) for the purpose of opening or administering your account and/or any other services, you confirm that you have their consent, or you are otherwise entitled to provide this information to us and for us to use it in accordance with the terms set out herein.
- C. To provide our services, collect and manage debts, and for ourselves and our third-party partners to carry out assessment and analysis of the services provided to you, we may share your information with other companies in the FBN Holdings Plc Group, service providers, debt collection agencies and with our third-party partners who have referred your business to us. To provide our services, we may also

share information with third party intermediaries who facilitate communications and delivery of products and services between us in relation to your account and the provision of the products and services which we offer. We will only share the minimum amount of your information necessary for us to achieve these purposes.

- D. We may also share your information with any statutory, governmental or regulatory body, as required by law, regulations or for other legitimate purposes. We will share your Personal Data and Sensitive Personal Data with credit reference and fraud prevention agencies. We and other organizations may access and use this information to make credit assessments and to prevent and detect fraud, money laundering and other crimes.
- E. You agree that should a member of the FBN Holdings Plc Group be required by law, regulation or by agreement with tax authorities to provide information about you (including information regarding your account) to any tax authority whether in the Nigeria or elsewhere, we may do so and irrespective of whether the tax authority in question requires the information for its own purposes or for the purposes of passing that information on to the tax authorities in another country where you may be subject to tax. Should we need any further information or documents from you to comply with our obligations or to answer any information requests received from a tax authority, you agree to provide us with any such information and documentation no later than 30 days from us sending a request to you.
- F. Other parties (including other companies in the FBN Holdings Plc Group) with whom we may share information may be in countries that might not have equivalent laws in place to protect information relating to you. If we transfer your information in accordance with these Terms to a person, office, branch or organization located in another country, we will take steps to obtain their agreement to apply the same levels of protection as we are required to apply to your information.
- G. Information held about you may already be linked to records relating to your partner or members of your household where a financial association has been created. Another person's record will be "associated" with yours when:
  - (a) you make a joint application;
  - (b) you advise us of a financial association with another person; or
  - (c) if a credit reference agency has existing linked or associated records.
- H. We will retain information about you after the closure of your account, if the banking business relationship has terminated, if you withdraw your consent, or if your application is declined or abandoned, for as long as permitted for legal, regulatory, fraud prevention and legitimate business purposes.

## **DATA SECURITY AND CONFIDENTIALITY**

We will treat your information as confidential and will not use it for any purpose incompatible with those outlined in these Terms. Reasonable measures will also be taken to safeguard against unauthorized or unlawful processing and accidental loss or destruction or damage to your information.

You will find our detailed Privacy Policy at <https://www.firstbanknigeria.com/home/legal/privacy-policy/>

**YOUR RIGHTS**

- A. You can ask for a copy of the information we hold about you by writing to us.
- B. If you wish to withdraw your consent or have concerns relating to the processing of your personal information, you may do so at any time by notifying us at [firstcontact@firstbanknigeria.com](mailto:firstcontact@firstbanknigeria.com) We will respond to your concerns within 30 days of receiving your notice and provide you with the necessary documentation to execute withdrawing your consent.

**FIRSTBANK CONTACT INFORMATION**

If you have any questions about this Data Processing Policy Statement or our data processing activities, please contact us at [firstcontact@firstbanknigeria.com](mailto:firstcontact@firstbanknigeria.com)

**CHANGES TO THIS DATA PROTECTION POLICY STATEMENT**

FirstBank reserves the right to update sections of this Data Protection Policy at any time. Please check this policy periodically for any changes.

**MEMORANDUM OF ACCEPTANCE**

I confirm that I have read, understood without any ambiguity and agree to be bound by the terms of the Bank’s Data Protection Statement as indicated above and I hereby accept same this..... day of ....., 2020.

SIGNED, SEALED AND DELIVERED by:

\_\_\_\_\_  
{name of customer}

In the presence of:

- NAME:
- SIGNATURE:
- ADDRESS:
- OCCUPATION: