



PROVIDUSBANK

PRIVACY NOTICE



Who We Are

At ProvidusBank, our tailored financial services delivery include: Business Advisory, Portfolio Management, Personalised Relationship Management, Fast-tracked Service delivery and Self-service solutions, as such we treat your Personal Data as private and confidential.

This Privacy Policy describes what Personal Data we collect, what we do with it and how we protect it.

Our registered office is at 54, Adetokunbo Ademola Street Victoria Island, Lagos. We act as the Data Controller when processing your Personal Data. Our designated Data Protection Officer can be reached on his email dpo@providusbank.com and telephone number +2348093625448

This policy (together with our Terms and Conditions) describe how we handle your personal data. By continuing to visit our website (www.providusbank.com) you accept and consent to the practices described in this policy.

What We Do

At ProvidusBank Limited we gather and process your Personal Data in accordance with this privacy notice (including Our Terms and Conditions) and in compliance with the relevant data protection regulation and laws. This notice provides you with the necessary information regarding your rights and our obligations and explains how, why, and when we process your personal data

Information That We Collect

We process your Personal Data to meet our legal, statutory and contractual obligations and to provide you with our products and services. We will never collect any unnecessary personal data from you and do not process your information in any way, other than as specified in this notice.

The personal data that we collect are:

- Name
- Date of Birth
- Home Address
- Personal Email
- Home Telephone Number
- Mobile Telephone Number



- Passport Number/ Driver's License Number
- National Identification Number (NIN)
- Taxpayer ID
- Sensitive Data (i.e. BVN, health/medical information, details about religion, sexuality, etc.)

We collect information in the below ways: -

Online form, website, hard copy form, email, employment CV's etc.)

How We Use Your Personal Data

We take your privacy very seriously and will never disclose, share or sell your data without your consent, unless required to do so by law. We only retain your data for as long as is necessary and for the purpose(s) specified in this notice. Where you have consented to us providing you with promotional offers and marketing, you are free to withdraw this consent at any time.

The purposes and reasons for processing your personal data are detailed below:

- We collect your personal data in the performance of a contract or to provide a service and to ensure that orders are completed and can be sent out to your preferred address
- We collect and store your personal data as part of our legal or compliance obligation
- We have a legal obligation to share your personal data with regulatory bodies and credit bureau who are a credit reference agency and provide us with financial background checks as part of our KYC obligations prior to you opening an account with us
- We will occasionally send you marketing information where we have assessed that it is beneficial to you as our customer and in our interests. Such information will be non-intrusive and is processed on the grounds of legitimate interests

Your Rights

You have the right to access any Personal Data that we process about you and to request information about:

- What personal data we hold about you
- The purposes of the processing
- The categories of personal data concerned
- The recipients of your personal data or who it will be disclosed to
- How long we intend to store your personal data for



- If we did not collect the data directly from you, information about the source.

If you believe that we hold any incomplete or inaccurate data about you, you have the right to ask us to correct and/or complete the information and we will strive to correct it as quickly as possible; unless there is a valid reason for not doing so, at which point you will be notified.

You also have the right to request erasure of your personal data or to restrict processing (where applicable) in accordance with the data protection laws; as well as to object to any direct marketing from us; to exercise your data portability rights, and to be informed about any automated decision-making we may use.

If we receive a request from you to exercise any of the above rights, we may ask you to verify your identity before acting on the request; this is to ensure that your data is protected and kept secure.

Sharing and Disclosing Your Personal Data

We do not share or disclose any of your Personal Data without your consent, other than for the purposes specified in this notice or where there is a legal requirement. We use [a third-party/third-parties] to provide the below services and business functions; however, all processors acting on our behalf only process your data in accordance with instructions from us and comply fully with this privacy notice, the data protection laws and any other appropriate confidentiality and security measures.

Safeguarding Measures

We take your privacy seriously and take every reasonable measure and precaution to protect and secure your personal data. We work hard to protect you and your information from unauthorised access, alteration, disclosure or destruction and have several layers of security measures in place, including but not limited to network security, password, Policies, SSL, TLS, encryptions, pseudonymisation, restricted access, IT authentication, firewalls, anti-virus/malware etc

Transfers Outside Nigeria

Personal data in Nigeria is protected by the Nigeria Data Protection Regulation (NDPR) but some other countries may not necessarily have the same high standard of protection for your personal data. ProvidusBank does not transfer or store any personal data outside Nigeria.

Legitimate Interests



As noted in the 'How We Use Your Personal Data' section of this notice, we occasionally process your Personal Data under the legitimate interests' legal basis. Where this is the case, we have carried out a thorough Legitimate Interests' Assessment (LIA) to ensure that we have weighed your interests and any risk posed to you against our own interests, ensuring that they are proportionate and appropriate.

How Long We Keep Your Data

ProvidusBank only ever retains Personal Data for as long as is necessary by regulation and we have strict review and retention policies in place to meet these obligations. We are required under Nigerian laws/CBN Guidelines to keep your basic personal data (name, address, contact details) for not more than 7 years after termination of business relationship.

Where you have consented to us using your details for direct marketing, we will keep such data until you notify us otherwise and/or withdraw your consent.

Sensitive Data

Owing to our Legal/Regulatory obligations, ProvidusBank sometimes needs to process sensitive Personal Data (known as sensitive data) about you, to [uniquely identify/distinguish you and sometimes for regulatory reasons]. Where we collect such information, we will only request and process the minimum necessary for the specified purpose and identify a compliant legal basis for doing so.

Where we rely on your consent for processing sensitive data, we will obtain your explicit consent through [a signature/explicit mechanism]. You can modify or withdraw consent at any time, which we will act on immediately unless there is a legitimate or legal reason for not doing so.

Disclosure of Your Personal Data

Law enforcement

Under certain circumstances, we may be required to disclose Your Personal Data if required to do so by Law or in response to valid requests by public authorities (e.g. a court or a government agency).

Other legal requirements

We may disclose Your Personal Data in the good faith belief that such action is necessary to:

- Comply with a legal obligation
- Protect and defend the rights or property of the Bank



- Prevent or investigate possible wrongdoing in connection with the service or services we provide
- Protect the personal safety of our staff or customers or the public
- Protect against legal liability

Links to Other Websites

Our website does not contain links to other sites that are not operated by us. If however in future we add third party sites to our website so that when you click on a third party link, You will be directed to that third party's site, We strongly advise You to review the Privacy Policy of every site You visit.

We have no control over and assume no responsibility for the content, privacy policies or practices of any third party sites or services.

Cookie Notice:

A 'cookie' is a small piece of data sent from a website and stored on the user's computer by the user's web browser, a cookie is downloaded onto your computer/mobile device so that the next time you visit that site, your device will remember useful information.

Our cookie policy explains what cookies are, the type of cookies we use and how we use them.

Types of Cookies and how we use them

1. Session Cookies: are cookies that expire when you leave the site or close your browser. it makes navigation and your experience on our site faster and more convenient
2. Persistent Cookies: are cookies that remain stored on your device until their expiry dates are exceeded or they are deleted. They are used to customize your experience.

When You access the Service by or through your Computer or a mobile device, We may collect certain information automatically, including, but not limited to, the type of mobile device You use, Your mobile device unique ID, the IP address of Your mobile device, your mobile operating system, the type of mobile Internet browser You use, unique device identifiers and other diagnostic data.

Keeping Your Personal Data Safe

Our cookies never store personal or sensitive information; they simply hold a unique random reference to you.



The cookies we use cannot read or search your computer or mobile device to obtain information about you or your family, or read any material kept on your device.

Cookie Preferences

Various browsers have different methods of managing cookies (including disabling options). However, you should note that some cookies are essential and disabling them may result in some functions or services not functioning properly.

Your Personal Data is used in:

1. Updating and enhancing our records.
2. Executing your instructions.
3. Establishing your identity and assessing applications.
4. Pricing and designing our products and services.
5. Administering our products and services.
6. Managing our relationship with you.
7. Managing our risks.
8. Identifying and investigating illegal activity such as fraud.
9. Contacting you, in instances where we suspect fraud on your account
10. Conducting and improving our businesses and improving your experience
11. Reviewing credit or loan eligibility.
12. Preventing money laundering or terrorism financing activities.
13. Complying with our legal obligations and assisting government and other law enforcement agencies or regulators.
14. Identifying and informing you about other products or services.
15. Processing your job application if you apply for a job with us.

Information We Share

We may share the information about you and your dealings with us, to the extent permitted by law, with the following:

- ProvidusBank Branches and Subsidiaries
- Regulators/Supervisors, Government Agencies/courts - It may be necessary by law, legal process, litigation, and/or requests from public and governmental authorities within or outside your country of residence for ProvidusBank to disclose your



Personal Data. We may also disclose information about you if we determine that for purposes of national security, law enforcement, or other issues of public importance, disclosure is necessary or appropriate.;

- External Auditors.
- ProvidusBank staff.
- Credit Agencies.
- Correspondent banks.

. We may also collect, use and exchange your information in ways permitted by law.

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. Our security controls and processes are also regularly updated to meet and exceed industry standards

Changes to this Privacy Policy

We may update our Privacy Policy from time to time. We will notify You of any changes by posting the new Privacy Policy on this page.

We will let You know via email and/or a prominent notice on our service, prior to the change becoming effective and update the "Last updated" date at the top of this Privacy Policy.

You are advised to review this Privacy Policy periodically for any changes. Changes to this Privacy Policy are effective when they are posted on this page.

Contact Us

If you have any questions about this Privacy Policy, you can contact us:

- By email: businessconciierge@providusbank.com
- dpo@providusbank.com



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- By Address: 54, Adetokunbo Ademola Street Victoria Island, Lagos
 - By Telephone: 070077684387