

## **IT Change Request Form**

**DATA PROTECTION CONSENT PORTAL**

Application/Service /Infrastructure Component	Finacle	Priority	High
Name	Unit	Signature/Date	
Folajimi Aroloye	Data Analytics	27/02/2020	
Opeyemi Alakija	BPR	27/02/2020	
Description – Detailed description of what change should be implemented and why			
<p>This request is to obtain customer consent in-branch</p> <p><b>BACKGROUND</b></p> <p>As part of complying to Nigeria Data Protection Regulation (NDPR) created by National Information Technology Development Agency (NITDA) in 2019, it is required that we acquire customer consent before their data can be collected, processed and used for any bank related activities and analysis.</p> <p><b>AS IS</b></p> <p>Currently, consent is only obtained on ALAT app and ALAT web.</p> <p><b>TO BE</b></p> <p>Consent should be obtained from customers bankwide. A portal should be put in place to ensure all consents are being captured at the branches.</p> <p><b>IMPACT</b></p> <ul style="list-style-type: none"><li>To ensure our business remains competitive in international trade through the safe-guards afforded by a just and equitable legal regulatory framework on data protection.</li><li>Non-implementation would lead to sanction to the tune of 2% of our annual revenue or Ten Million Naira (#10,000,000), whichever is higher</li></ul> <p><b>FUNCTIONAL REQUIREMENTS</b></p> <ul style="list-style-type: none"><li>Creating a database (DB) of all our customers. This database should be updated with the record of consents already gotten through ALAT. The database that should be created in a way to capture the CIF and not account number.</li><li>Designing a web portal where consents captured in the branch will be uploaded and immediately updated in the consent database.</li></ul>			

- Upon inputting customers account number on Finacle, if customer has never signed the consent form, a popup should be displayed notifying the user to obtain customers consent
- The popup should have a link or button that redirect user to the portal for upload of the duly completed consent form.
- However, If customer consent already exists in the DB there should not be further pop up.

#### Network Components Affected if any

	Source Address /Subnet Mask	Source Protocol/Port	Destination Address /Subnet Mask	Destination Protocol/Port	Action: Deny/Permit	Rule: Add/Remove/Modify	Description
	NONE						

#### Business Benefits (in terms of ROI, TAT, Cost Savings or other Fiscal benefits)

- It will foster safe conduct for transactions involving the exchange of Personal Data
- We will be able to avoid regulatory infractions.
- It will safeguard the rights of natural persons to data privacy

#### Expected impact of change request (Please specify any/all that apply – to be filled by Implementing Unit)

- After implementation, we would be able to capture and track customers consents in-branch

#### Supervisor Concurrence

**Desired Implementation Date**

**Name**

Kolawole Oladejo

**Signature/Date:**

#### HOD Concurrence

**Desired Implementation Date**

**Name**

Babatunde Mumuni

**Signature/Date:**

#### Head BPR

**Signature/ Date:**

**Implementing Unit**

**Name**

Kemi Adeniji

#### Roll back plan in the event change is not successful (Operational or Technical where applicable)

Revert to status quo if implementation fails

#### Risk Assessment & Mitigation (Determine the quantitative or qualitative value of risk related to the change been requested and the recognized threat.)

##### Risk:

Regulatory sanction can occur from capturing wrong CIF in the consent database, and subsequent use of such customer's details for bank related activities and analysis.

<b>Mitigation:</b> Branch operation staff should be sensitized about the implication of capturing wrong CIF.		
<b>Security Requirements (Minimum security requirements for the Change)</b>		
<b>IT Architecture and Strategy: Review Comments</b>		
Major Change		
<b>Change Advisory Board (CAB) Members</b>		
<b>Change Advisory Board (CAB) Recommendations and Comments</b>		
<b>Change Advisory Board Sign Off</b>		
Name/Unit/Signature/Date:	Name/Unit/Signature/Date:	Name/Unit/Signature/Date:
Name/Unit/Signature/Date:	Name/Unit/Signature/Date:	Name/Unit/Signature/Date:
Name/Unit/Signature/Date:	Name/Unit/Signature/Date:	Name/Unit/Signature/Date:
<b>Head, Applications Management – Signature/Date:</b>	<b>Head, Infrastructure Management –Signature/Date:</b>	<b>Head, Information Technology – Signature/Date:</b>
<b>Testing of Change (put comments and the new change to be made here)</b>		

<b>Supervisor Concurrence</b>		<b>Implementation Date</b>
<b>Name</b>	<b>Signature/Date:</b>	

**PREPARED BY:**

Folajimi Aroloye

DATA SCIENTIST

27 February 2020

**UNIT HEAD/BSM/BDM:**

Kolawole Oladejo

HEAD DATA ANALYTICS

27 February 2020

**HOD/ZOTL/REGIONAL:**

Babatunde Mumuni

HEAD CORPORATE  
TRANSFORMATION &  
INNOVATION

Reviewed

28 February  
2020

Actioned By  
Babatunde  
Mumuni

**REVIEWED BY:**

NAME	DESIGNATION	COMMENT	DATE
Oluseyi Ajibode	INFORMATION SECURITY ANALYST	Kindly note the alternations made and correct the memo	28 February 2020
John Omosule	ANALYST	Reviewed	27 February 2020

George Nwokentah	IT GOVERNANCE AND RISK OFFICER	Reviewed	27 February 2020
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**CONCURRENCE:**

NAME	DESIGNATION	COMMENT	DATE
Ejiro Agboro	Chief Technology Officer	Okay to process	03 March 2020
Chibuike Agu	HEAD, APPLICATION SERVICES & OPERATIONS	Approved	03 March 2020
Oluwakemi Adeyemi	ACTING HEAD OPERATIONAL RISK MANAGEMENT	Reviewed	28 February 2020
Kolawole Oladejo	HEAD DATA ANALYTICS	Approved	28 February 2020
Chika Adun	TEAM LEAD BUSINESS PROCESS RE-ENGINEERING	Although the preference is to collect consent from customers electronically, we are constrained to adopt the paper based approach due to the fact that majority of our customers are not on the Alat platform. Hence the request for a portal to collate all consent feedback and ensure proper tracking.	28 February 2020

Name	Designation	Approval/Signature
<b>Approved By:</b>		

Name	Designation	Approval/Signature
Babatunde Mumuni	HEAD CORPORATE TRANSFORMATION & INNOVATION	
Adeoluwa Akomolafe	CHIEF INFORMATION SECURITY OFFICER	
Oluwatoyin Karieren	CHIEF COMPLIANCE OFFICER	
Kemi Adeniji	HEAD, CUSTOMER EXPERIENCE AND PROCESS MANAGEMENT	
<b>Final Approval By:</b>		
Richard Amafonye	CHIEF INFORMATION OFFICER	Approved 09 March 2020 approved