



PremiumTrust Bank

Privacy Policy

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Document Control Sheet

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Change Control

Change Clause/Frequency
The contents of this document are subject to change control on a twelve (12) months review cycle.

Introduction

At PremiumTrust Bank Limited, (hereinafter called "PremiumTrust"), we treat your personal information as private and confidential. We are dedicated to protecting your privacy and providing you with the highest level of security at any point of interaction with us. This Privacy Policy describes what personal information we collect, what we do with it and how we protect it.

This Policy (together with our Terms and Conditions) 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 practices regarding your personal data and how we will treat it to ensure data protection and privacy of customers.

By continuing to visit our website (www.premiumtrustbank.com) and other PremiumTrust customer touchpoints and by ticking/choosing the relevant boxes which seek your consent whenever they appear, you understand, accept and consent to the practices described in this Policy.

Information we collect and use

- We collect information about you from a variety of sources, such as: website and associated websites visits, applications, identification documents, curriculum vitae, personal financial statements, and interactions with relationship managers, credit bureaus, payment gateways, other financial institutions, and other written or electronic communication reflecting information not limited to your name, address, passport details, identification numbers, biometric information, telephone number, occupation, assets, income etc.
- We may also use your transactional account history including your account balance, deposit/withdrawal/transfer records, debit/credit card usage, and other payment history and transactions records.
- We may also use information received from third parties such as family, solicitors, friends or employers, website/ social media pages made public by you, government agencies, regulators, supervisory or credit agencies.
- We may also collect other information such as video footages of you whenever you step into any of our branches, telephone conversations when you call any of our contact centre lines, geographic information of any of our branch ATMs when you use our ATMs.
- We may also collect and use information about you when you apply for a loan or credit facility; seek advice about your investments; seek information from our customer service provider; or information concerning complaints and disputes, or use your login credentials for online banking and mobile banking apps; and when we conduct necessary investigations i.e., due diligence checks, and AML/CFT checks and obtain information that we need to support our regulatory obligations,

Note that we may collect information about your computer (or mobile device), including where available your IP address, 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

Non-personal information collected by us

In order to achieve our goal of providing you with the best banking service, we sometimes collect certain information during your visits to perform certain tasks such as grant you access to some parts of our website or conduct research on your behaviour on our site in order to improve our services. We will not disclose your information to any person outside our organization except as described in this Privacy Policy.

Cookies

Cookies are unique identifiers that we transfer to your device or computer to enable our systems to recognize your device or computer and to provide features to make your navigation experience unique and targeted.

The acceptance of cookies is not a requirement for accessing the Platform. Cookies are tiny text files which identify your device or computer to our server as a unique user when you visit our website, and they are stored by your Internet browser on your device or computer's hard drive. Cookies can be used to recognize your Internet Protocol address, saving you time while you are on, or want to access the Service.

We only use cookies for your convenience in using the Service and not for obtaining or using any other information about you. Your browser can be set to not accept cookies. However, if you do not accept cookies on your web browser or allow permissions on your mobile device, our online service experience to you may be degraded and you may not be able to enjoy the Service.

Examples of Cookies we use:

- Session Cookies: We use Session Cookies to operate our Service. Session cookies will expire at the end of your browser session and allow us to link your actions during that browser session.
- Preference Cookies: We use Preference Cookies to remember your preferences and actions, across multiple sites.
- Security Cookies: We use Security Cookies for security purposes.

Use of personal information

Any personal information provided by you to PremiumTrust will be used with your consent, or when we have a lawful reason. These include

- Cases where processing of personal data is required for the fulfilment of a contractual obligation.
- Cases where processing of personal data is required for compliance with legal and/or regulatory requirements.
- Cases where processing is required to protect your vital interest or that of any other natural person.
- Cases where processing is required for an activity to be carried out for significant public interest.

- Cases where processing is required for legitimate interests of PremiumTrust or a third party insofar as this does not conflict with the requirements for the protection of your personal data.

Your personal information will be used in:

- Updating and enhancing PremiumTrust's records
- Executing your instructions.
- Establishing your identity and assessing applications for our products and services
- Pricing and designing our products and services
- Administering our products and services
- Managing our relationship with you
- Managing our risks
- Identifying and investigating illegal activity (i.e.), such as fraud
- Contacting you, for example in instances where we suspect fraud on your account or when the need arises to tell you about recent occurrences in the banking sector or some event(s) of significance.
- Conducting and improving our businesses and improving your experience with us
- Reviewing credit or loan eligibility.
- Preventing money laundering or terrorism financing activities.
- Complying with our legal obligations and assisting government and law enforcement agencies or regulators/supervisors
- Identifying and informing you about other products or services that we think may be of interest to you.
- Processing your job application if you apply for a job with us.
 - To deliver advertising to you directly or on our websites, provide updates on special deals and offers that might interest you (unless you tell us otherwise).
 - Keeping you informed of general announcements or important news about your accounts.
 - Recording conversations you have with us, including phone calls, face-to-face meetings, letters, emails, and any other kinds of communication. These recordings may be used to check your instructions to us and improve on our product and service delivery

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

Automated Processing

We sometimes use automated systems and software to help us reach decisions about you, for example, to make credit decisions, to carry out security, fraud and money laundering checks, or to process your data when you apply for some of our products and services.

This type of processing is carried out under lawful basis, and you can contact us to request that automated processing be reviewed by a human being if you detect any inaccuracies in your personal data.

Information we share

PremiumTrust, in efforts to provide you with excellent products and services may share your information in order to provide you with products or services you've requested.

We may also share your information where we have a public or legal duty to do so, when we need it to conclude regulatory reporting and when we have requested and received your permission to share it.

We may share your personal data with others for a few reasons including:

- With our affiliated entities: We may share your Personal Data with entities affiliated to us to, among other things, provide the Service you have requested or authorized to help detect and prevent potentially illegal and fraudulent acts and other violations of our policies and agreements.
- We share Personal Data with other financial institutions that we have partnered with to provide the Service.
- With other third parties for our business and other legal purposes and as permitted or required by law.
- We do not sell, trade, or otherwise transfer your personally identifiable information to unaffiliated third parties. This does not include Application Support team and other parties who assist us in operating the Platform and providing the Service to you. We may also release your information when we believe release is appropriate to comply with the law, enforce our Platform policies, or protect ours or others' rights, property, or safety.

How we protect your information

To protect your personal Data we maintain technical, physical, and administrative security measures designed to provide reasonable protection for your Personal Data against loss, misuse, unauthorized access, disclosure, and alteration. The security measures include firewalls, data encryption, physical access controls to our data centres, and information access authorization controls. Although we have taken measures to secure and keep your information confidential, because the security of your data is important to us, please be aware that no method of transmission over the Internet, or method of electronic storage can always guarantee 100% security. While we strive to use commercially acceptable means to protect your Personal Data, we cannot guarantee its absolute security, you are responsible for securing and maintaining the privacy of your password and Account/profile registration information and verifying that the Personal Data we maintain about you is valid, accurate and up to date. If we receive instructions using your profile information, we will consider that you have authorized the instructions and process your instruction accordingly and without incurring any liability for doing so.

Where we store your Information

All Personal Information you provide to us is stored on our secure servers as well as secure physical locations and cloud infrastructure (where applicable) for the purposes of providing seamless services to you, including but not limited to ensuring business continuity, the data that we collect from you may be transferred to or stored in cloud locations at globally accepted vendors' data centre. Whenever your information is transferred to other locations, 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 will keep your personal data for as long as we have a relationship with you, i.e., for as long as you use the Service, or partake in surveys. Once that relationship with you has come to an end (e.g., following closure of your account), we will not gather or collect any new information about you. Once the relationship is over, we will only

retain personal data as long as it required for the purpose for which you have given it and as required by law. subject to our maintaining accurate financial records, operational, legal and regulatory requirements.

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

Your rights

You have certain rights available to you, these include

- The right to access your personal information held by us. Your right of access can be exercised by sending an email to contactpremium@premiumtrustbank.com.
- The right to rectify inaccurate or incomplete information.
- The right to withdraw consent for processing in cases where consent has previously been given by using any unsubscribe links at the bottom of our emails or by sending an email to contactpremium@premiumtrustbank.com.
- The right to restrict or object to processing of your personal data. We might continue to process your data if there are valid legal or operational reasons

You also have the right to:

- Request that your personal data be made available to you in a common electronic format and/or request that such data be sent to a third party.
- Request that your information be erased. We might continue to retain such data if there are valid legal, regulatory or operational reasons.

Maintain accurate information

Keeping your account information accurate and up to date is very important. You have access to your account information, which includes your contact information, account balances, transactions and similar information through various means, such as account statements, SMS Banking, Social Media Banking and Internet Banking.

If you discover any inaccuracies in your personal information, please promptly notify us, via our branch network or Contact Centre, and provide the required documentary evidence, to enable us to implement the necessary updates or changes.

Third-party sites and services

PremiumTrust's websites, products, applications, and services may contain links to third-party websites, products and services. Our products and services may also use or offer products or services from third parties. Information collected by third parties, which may include such things as location data or contact details is governed by their privacy practices and PremiumTrust will not be liable for any breach of confidentiality or privacy of your information on such sites. We encourage you to learn about the privacy practices of those third parties.

Information shared socially

The Service may allow you to connect and share your actions, comments, content, and information publicly or with friends. We are not responsible for maintaining the confidentiality of any information you share publicly or with friends. The Service may

also allow you to connect with us on, share on, and use third-party websites, applications, and services. Please be mindful of your personal privacy needs and the privacy needs of others, as you choose whom to connect with and what to share and make public. We cannot control the privacy or security of information you choose to make public or share with others. We also do not control the privacy practices of third parties. Please contact those sites and services directly if you want to learn about their privacy practices.

Transfer across borders

Sometimes we will process your personal information in other countries, either to carry out your instructions or for ordinary business purposes. Some countries may not have the same level of protection. If necessary, we will ask the party to whom we transfer your personal information to agree to our privacy principles, associated policies and practices.

Social Media Platforms

PremiumTrust may interact with registered users of various social media platforms, including Facebook, Twitter, Google+, LinkedIn and Instagram. Please note that any content you post to such social media platforms (e.g., pictures, information or opinions), as well as any personal information that you otherwise make available to users (e.g., your profile) is subject to the applicable social media platform's terms of use and privacy policies. We recommend that you review this information carefully in order to better understand your rights and obligations regarding such content.

Privacy of Minors

The services on the Website are not directed to anyone under the age of 18. We do not knowingly collect names, email addresses, or any other personal data from minors or other individuals who are not legally able to use the Platform. We do not allow minors under the age of 18 to open accounts nor provide Services for anyone less than 18 years of age without the consent of a guardian. If you are a parent or guardian and you are aware that your child has provided us with Personal Data, please contact us. If we obtain actual knowledge that we have collected Personal Data from a person under the age of 18, we reserve the right to delete it, unless we are legally obligated to retain such data.

Promotional messages

PremiumTrust may sometimes contact you with products or services that we think may be of interest to you. If you don't want to receive such promotional materials from us, you can opt out at any time by using any unsubscribe links at the bottom of our emails or by sending an email to contactpremium@premiumtrustbank.com.

Complaints Resolution

Where you have any complaints in regards to your privacy, kindly submit such complaint to us first by sending an email to contactpremium@premiumtrustbank.com or address your complaint to "The Data Protection Officer" at Plot 1612, Adeola Hopewell Street, Victoria Island, Lagos State, Nigeria. If you are not satisfied with our response, you can contact any regulatory body you deem fit to resolve your request.

We will ensure all complaints are resolved in a timely manner consistent with all relevant regulatory provisions.

Privacy Policy changes

We may revise this Privacy Policy from time to time to reflect changes to our business, Platform or Service, or applicable laws. The revised Privacy Policy will be effective as of the published effective date. Accordingly, we encourage periodic reviews of this Privacy Policy for awareness of any changes that may have occurred.

Your continued use of the Platform after we post any modifications to the Privacy Policy on this page will constitute your acknowledgment of the modifications and your consent to abide and be bound by the modified Privacy Policy.