



PremiumTrust Bank

Employee Privacy Policy

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Document Control Sheet

Version and Update History

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Change Control

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

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1 Introduction

PremiumTrust Bank is aware of its obligations under the Nigeria Data Protection Regulation (NDPR) and is committed to processing your data securely and transparently. This privacy notice sets out, in line with NDPR, the types of data that we hold on you as an employee of the Bank. It also sets out how we use that information, how long we keep it for and other relevant information about your data.

This notice applies to current and former employees, workers and contractors.

2 How we use your information

2.1 What information we collect

We hold many types of data about you, including:

- your personal details including your name, address, date of birth, email address, phone numbers.
- your photograph
- gender
- marital status
- dependants, next of kin and their contact numbers
- medical or health information including whether or not you have a disability
- information included on your CV including references, education history and employment history.
- bank details.
- government identification number
- current and previous job titles, job descriptions, pay grades, pension entitlement, hours of work and other terms and conditions relating to your employment with us
- letters of concern, formal warnings and other documentation with regard to any disciplinary proceedings
- internal performance information including measurements against targets, formal warnings and related documentation with regard to capability procedures, appraisal forms
- leave records including annual leave, family leave, sickness absence etc
- details of your criminal record
- training details
- CCTV footage
- building entry card log

- We may receive your personal data from a third party who recommends you as a candidate for a specific job opening or for our business more generally.

2.2 How we use the personal data we collect about you

The Nigeria Data Protection Regulation (NDPR) allows us to process your data for certain reasons only in order:

- to perform the employment contract that we are party to
- to carry out legally required duties
- for us to carry out our legitimate interests
- to protect your interests and
- where something is done in the public interest.

All processing carried out by us falls into one of the permitted reasons. Generally, we will rely on the first three reasons set out above to process your data. For example, we need to collect your personal data in order to:

- carry out the employment contract that we have entered with you and
- ensure you are paid.

We also need to collect your data to ensure we are complying with legal requirements such as:

- ensuring tax is paid

We also collect data so that we can carry out activities which are in the legitimate interests of the Bank. We have set these out below:

- making decisions about who to offer initial employment to, and subsequent internal appointments, promotions etc.
- making decisions about salary and other benefits
- providing contractual benefits to you
- maintaining comprehensive up to date personnel records about you to ensure, amongst other things, effective correspondence can be achieved and appropriate contact points in the event of an emergency are maintained
- effectively monitoring both your conduct and your performance and to undertake procedures regarding both of these if the need arises
- offering a method of recourse for you against decisions made about you via a grievance procedure
- assessing training needs
- implementing an effective sickness absence management system including monitoring the amount of leave and subsequent actions to be taken including the making of reasonable adjustments
- gaining expert medical opinion when making decisions about your fitness for work
- managing statutory leave and pay systems such as maternity leave and pay etc.

- business planning and restructuring exercises
- dealing with legal claims made against us
- preventing fraud
- ensuring our administrative and IT systems are secure and robust against unauthorised access

2.3 Who we disclose your personal data to

The Bank acts to protect your personal information and ensure that unauthorized individuals do not have access to your Information by using security measures to protect personal data. We will not knowingly disclose, sell, or otherwise distribute your personal data to any third party without your knowledge and, where appropriate, your express written permission, except under the following circumstances.

- **Legal requests and investigations.** We may disclose your personal information when such disclosure is reasonably necessary (i) to prevent fraud; (ii) to comply with any applicable statute, law, rule, or regulation; or (iii) to comply with a court order.
- **Third-party vendors and service providers.** We may, from time to time, outsource services, functions, or operations of our business to third -party service providers. When engaging in such outsourcing, it may be necessary for us to disclose your Personal Information to those service providers, e.g., a payroll service, health management organisations, a benefits provider. In some cases, the service providers may collect Personal Information directly from you on our behalf. We will work with any such providers to restrict how the providers may access, use, and disclose your Information.
- **Business Transfers:** During the term of your employment we may buy other companies, create new subsidiaries or business units, or sell part or all of the Company or its assets. It is likely that some or all of your Personal Information will be transferred to another company as part of any such the transaction. However, your Personal Information will remain subject to protection outlined in the then current Privacy Policy.
- **Protection of Company and Other.** We may release Personal Information when we believe that the release is necessary to comply with the law; enforce or apply our policies and other agreements; or protect the rights, property, or safety of Bank, our employees, or others. This disclosure will never, however, include selling, renting, sharing, or otherwise disclosing your Personal Information for commercial purposes in violation of the commitments set forth in this Privacy Policy.

2.4 How we protect your personal data

We take appropriate measures to ensure that your personal data is kept secure including security measures to prevent personal data from being accidentally lost or used or accessed in an unauthorised way. We limit access to your personal data to those who have a genuine business need to know it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality.

We also have procedures in place to deal with any suspected data security breach. We will notify you and the authority of a suspected data security breach where We are legally required to do so.

Where we share your data with third parties, we provide written instructions to them to ensure that your data are held securely and in line with NDPR requirements. Third parties must implement appropriate technical and organisational measures to ensure the security of your data.

2.5 How long we keep your personal data

In line with the NDPR, we only keep your data for as long as we need it for, which will be at least for the duration of your employment with us though in some cases we will keep your data for a period of 6 years after your employment has ended.

2.6 Your right as a data subject

Under the NDPR, you have a number of important rights. In summary, they include rights to

- require Us to correct any mistakes in your information which We hold.
- require the erasure of personal data concerning you in certain situations.
- receive the personal data concerning you which you have provided to Us, in a structured, commonly used, and machine-readable format and have the right to transmit those data to another organisation in certain situations.
- object at any time to processing of personal data concerning you for direct marketing.
- object in certain other situations to our continued processing of your personal data.
- otherwise restrict our processing of your personal data in certain circumstances
- claim compensation for damages caused by our breach of any data protection laws.

Where you have provided consent to our use of your data, you also have the unrestricted right to withdraw that consent at any time. Withdrawing your consent means that we will

stop processing the data that you had previously given us consent to use. There will be no consequences for withdrawing your consent.

If you wish to exercise any of the rights explained above, please contact HR department or the data protection officer.

2.7 **Update to this privacy policy**

We regularly review and, if appropriate, update this privacy policy from time to time, and as our use of personal data evolves. If we want to make use of your personal data in a way that we haven't previously identified, we will contact you to provide information about this and, if necessary, to ask for your consent.

We will update the version number and date of this document each time it is changed.