



FCMB Bank (UK) Limited

Privacy Policy

General Data Protection Regulation

Definitions

“data regulations” means the EU General Data Protection Regulation 2016/679 ("GDPR"); and any other applicable local and national legislation relating to privacy or data protection.

"personal data", "data subject", "controller", "processor" and "process", such terms shall have the same meanings as provided in the data regulations

About this policy

This policy provides an explanation of the information we collect about you; including, how we use it, why we use it, how we keep it safe, and what your respective rights are. When you use our website, you agree to the way we collect and use your personal data according to the terms of this privacy policy.

Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it. We keep certain basic personal data when you visit our website and recognise the importance of keeping that personal data secure and letting you know what we will do with it.

About Us

We are FCMB Bank (UK) Limited (FCMB UK), for the purpose of the EU General Data Protection Regulations (GDPR); the controller and processor of your personal data is;

FCMB Bank (UK) Limited,
81 Gracechurch Street,
London,
EC3V 0AU.

FCMB Bank (UK) Limited is authorised by the Prudential Regulation Authority and regulated by the Financial Conduct Authority and the Prudential Regulation Authority in the United Kingdom (Financial Services Register number: 502704), (Companies House Registration number 6621225):

Who is the Data Protection Officer?

We have appointed a Data Protection Officer to ensure compliance with this privacy policy is maintained. If you have any questions about this privacy policy or how we handle your personal data, please contact the DPO at the contact details provided in this policy;

The Data Protection Officer

FCMB Bank (UK) Limited
81 Gracechurch Street
London
EC3V 0AU
dpo@fcbmuk.com

How do we get your data?

We collect and process your personal data when you complete and submit an application form; applying for our products and services. We may also collate your personal data when you visit our website, or engage in face to face visit to our office in the UK or our FCMB Group entities based in Nigeria and through electronic communication (including telephone conversations) in order to provide our products and services to you.

What do we class as personal data?

We class personal data for the purpose of data regulations to include information pertaining to your name, residential and or domicile address, date and place of birth, email address, phone or contact numbers, bank accounts or utility bills information, tax specific information, passport and identity card specific information. For the purpose of data regulations; it also includes video footage when you visit our UK office, telephone recordings and or cookies which we may gather when you visits our website.

Why do we need your personal data?

We primarily ask for your personal data to enable us proceed with due diligence checks which are necessary to identify you and ascertain you are who you say you are when you want to sign up for our products and services. We may, in the course of conducting due diligence checks approach and

exchange information with third party organisations or third party sources; to help us with further information to help verify your identity. We may also collect your personal data to help profile and market our products and services which may be of interest to you.

Your personal data also helps us to contact and keep you informed about updates that concern your relationship with us; especially where changes in the way your account is run is impacted by changes in data regulations, our services and or processes.

We may also use your personal data to contact you as part of our annual reviews and data quality check to ensure your data with us is accurate, up to date and relevant.

We also use your personal data for credit assessment, referencing and scoring, IT system testing and analysis, statistical, market and product analysis and market research. The ensuing reports may be shared internally or with FCMB Group entities. The information in these reports are not specific to you and you will not be identifiable from them.

What else do we need your data for?

We may transfer your personal data to FCMB Group entities, regulatory bodies, prosecuting authorities, tax and governmental authorities, courts and tribunals, service providers and other business counterparties located in the United Kingdom or countries outside the European Economic Area (EEA), including countries which have different data protection standards to those which apply in the EEA.

This may include transfer of personal data to Nigeria or elsewhere where FCMB Group entities is situated. When we transfer your personal data to FCMB Group entities, service providers or other business counterparties in these countries, we will ensure that they protect your personal data in accordance with EEA-approved standard data transfer agreements or other appropriate safeguards. In the rare event that we sell or buy any business or assets, we may be obligated to disclose your personal data to the prospective seller or buyer of such business or assets.

Our legal reasons for processing your data

We are permitted to process your personal data in compliance and conformity with the prevailing data regulations. We therefore rely on the following provisions of the regulation as reason for processing your data;

- We have your explicit consent granting us permission to process your personal data for a specific reason which you are aware of.
- The personal data we process is required to enable us perform our contractual obligation with you.
- The personal data we process is necessary for our compliance with our legal obligation.
- The personal data we process is necessary and in fulfilment of the legitimate interest pursued by us, which includes:
 - a) to provide our products and services to you;
 - b) to ensure our customer accounts are managed accordingly;
 - c) to prevent, detect and investigate instances of fraud;
 - d) to prevent and prosecute alleged fraud, money laundering and other financial and non-financial crimes;
 - e) to aid the verification of your identity in order to protect our business;
 - f) to comply with rules and regulations that apply to us;
 - g) to protect our business interest;
 - h) to ensure the appropriate treatment of complaints;
 - i) to aid the development and improve on our services and servicing; or
 - j) and where you have not opted out; to keep you informed about us, our products and services

What are your rights?

You have the right to ask us not to process your personal data for marketing purposes. We will inform you if we intend to use your data for such purposes or if we intend to disclose your personal data to any third party for such purposes. You can exercise your right to prevent such processing by ticking the appropriate consent box on the application forms we use to collect your data. You also have the right to change your mind and request to opt out of any processing of your data, this is however, subject to rules and obligations as contained in data regulations.

The data regulations also provides you with other qualifying rights which we will adhere to. These rights include;

- The right to be informed about the collection and use of your personal data.
- The right of access to your personal data that we hold.
- The right to rectification; and to have any inconsistent personal data rectified, remedied or completed if it is inaccurate.
- The right to erasure entitles you to have your personal data we hold to be deleted.
- The right to restrict processing.
- The right to data portability.
- The right to object.
- Rights in relation to automated decision making and profiling.

If you wish to exercise any of these rights, you can write or call the Data Protection Officer to address your requirement. We are obligated to provide a resolution to your inquiry.

What happens when you use our website?

This policy only applies to our site. If you leave our site via a link or otherwise, you will be subject to the policy of that website provider.

We may collect information about your computer, including where available your internet protocol (IP) address, operating system and browser type, for system administration and to report aggregate information to our advertisers. This is statistical data about our users' browsing actions and patterns, and is not intended to identify any individual and we will not collect personal data in this way.

We may obtain information about your general internet usage by using a cookie file which is stored on the hard drive of your computer. Cookies contain information that is transferred to your computer's hard drive. They help us to improve our site and to deliver a better and more personalised service. They enable us:

- to estimate our audience size and usage pattern.
- to store information about your preferences, and so allow us to customise our site according to your individual interests.
- to speed up your searches.
- to recognise you when you return to our site.

You may refuse to accept cookies by activating the setting on your browser which allows you to refuse the setting of cookies. However, if you select this setting you may be unable to access certain parts of our site. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies when you log on to our site.

Our site may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

How long do we keep your personal data?

We keep your personal data for as long as is necessary for the purposes of our relationship with you or in connection with performing an agreement with you or complying with data regulations, legal and or regulatory obligations.

We will only keep the information we collect about you on our systems (hard and or soft) or with third parties for as long as required for the purposes you are contracted to us. We anticipate conducting regular reviews of your personal data; to ensure the data is accurate, up to date and relevant.

We are obligated to destroy or erase data after data regulation requirements have lapsed. There are however instances; where we may retain your data, or specifically information relating to your account after you are no longer a customer; for longer period, provided it is required for a legal, regulatory, fraud prevention or other legitimate business requirements.

Can you access your personal data that we hold?

The regulations gives you the right to access personal data we hold about you. Your right of access can be exercised in accordance with the data regulations. If you wish to make a subject access request; please contact the Data Protection Officer with the contact details provided in this policy. It is a free service.

How do we communicate with you?

We may communicate with you only through methods you have instructed us to reach out to you with; this may also include via electronic mail, telephone or via any approved means you have agreed to. We will never call or email to ask you for your password or account number.

When you contact us through any of our communication channels including visiting our UK or Lagos Liaison office, we will verify your identity by asking you a number of questions based on the personal data known to us about you and or account specific information. We may call you to discuss ways to help improve our products and services and we may also record your calls to us; for training, quality and security purposes.

Can you opt out of any agreed marketing arrangement with us?

Yes, you can! Contact our Data Protection Officer and we will make this happen. There are no recourses or detriments to you from us, if you wish to do this.

What if we make changes to this policy?

Any changes we may make to our privacy policy in the future will be posted on this page and, where appropriate, we will notify you by e-mail. However, we advise that you check this page regularly to ensure you are up to date with any revised changes.

Who can you complain to?

If you have immediate concerns about how we are managing or managed your personal data, please contact the DPO at the contact details provided in this policy; we ask you tell us first so we can work together towards a remedy.

Who else can you complain to?

You can contact the Information Commissioners Office (ICO), if you are worried about how we have handled your personal data. You also have the right to make a complaint at any time to the ICO for data protection issues. The ICO can be reached via their helpline on 0303 123 1113. As a data subject, you will find more information about your rights, the extent of the ICO's powers and actions they can take on their website at <https://ico.org.uk/>

Tell us how to make this better?

If you have questions, comments and requests regarding this privacy policy, you are welcome to address this to dpo@fcbuk.com.

Effective Date

This policy was last modified May 24, 2018