



# DATA PROTECTION/PRIVACY POLICY

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## Confidentiality

No part of this document may be disclosed verbally or in writing, including by reproduction, to any third party without the prior written consent of Fidelity Bank. This document, its associated appendices and any attachments remain the property of Fidelity Bank and shall be returned upon request.

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## Document Control Sheet

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## **Change Control**

The contents of this document are subject to change control

## **Document Review**

This document is subject to continuous changes. In case there are no changes, then an annual review shall be performed

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## 1. Introduction

Fidelity Bank Plc is a bank licensed in Nigeria by the Central Bank of Nigeria. We provide banking services to a wide variety of customers including individuals, small and medium enterprises, large corporates and multinationals, governmental institutions and non-governmental institutions. Our banking services are provided at our branches and through e-channels including the Internet.

Customers and potential customers can access our services through these channels including our website [www.fidelitybank.ng](http://www.fidelitybank.ng).

By accessing the Bank's services through account opening at the branch and or e-channels and or subscribing to any of our various products such as online banking, instant banking, ATM card services, customers provide certain personally identifiable information.

This document details the policies of the Bank guiding the collection, use, storage, destruction and disclosure of this personally identifiable information.

This policy document is available on our website at [www.fidelitybank.ng](http://www.fidelitybank.ng) and our branches. Please read it thoroughly before accessing our service. By opening an account or accessing or subscribing to any of the Bank's services, you give consent to the processing of your personal data in accordance with this policy.

Unless otherwise defined in this Privacy Policy, terms used in this Privacy Policy have the same meanings as in our Terms and Conditions on [www.fidelitybank.ng](http://www.fidelitybank.ng).

***Please read this privacy policy carefully as it will help you make informed decisions about sharing your personal information with us.***

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## 1.1 Glossary

“Consent” of the Data Subject means any freely given, specific, informed and unambiguous indication of the Data Subject's wishes by which he or she, through a statement or a clear affirmative action, signifies agreement to the processing of Personal Data relating to him or her;

“Data” means characters, symbols and binary on which operations are performed by a computer, which may be stored or transmitted in the form of electronic signals, stored in any format or any device;

“Data Protection Officer or DPO” means the person appointed as such under the Data Protection Laws and in accordance with its requirements. A DPO is responsible for advising Fidelity Bank (including its employee) on their responsibilities under the Data Protection Laws, for monitoring compliance with Data Protection Law

“Data Subject” means any person, who can be identified, directly or indirectly, by reference to an identification number or to one or more factors specific to his physical, physiological, mental, economic, cultural or social identity;

“Our Services” means the online banking services provided by to the Bank to the customer, which include but not limited to Online/Mobile banking, instant banking

“Personal Data” means any information relating to an identified or identifiable natural person ('Data Subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person; It can be anything from a name, address, a

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photo, an email address, bank details, posts on social networking websites, medical information, and other unique identifier such as but not limited to MAC address, IP address, IMEI number, IMSI number, SIM, Personal Identifiable Information (PII) and others;

“Personal Identifiable Information (PII)” means information that can be used on its own or with other information to identify, contact, or locate a single person, or to identify an individual in a context

“PCI DSS” means Payment Card Industry Data Security Standards

“Processing” means any operation or set of operations which is performed on Personal Data or on sets of Personal Data, whether or not by automated means, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction;

## **2. Information Collection and Use**

We collect several different types of information for various purposes to provide and improve our services to you.

### **2.1. Types of Data Collected**

#### **Personal Data**

While using our services, we may ask you to provide us with certain personally identifiable information that can be used to contact or identify you ("Personal Data"). Personally identifiable information may include, but is not limited to:

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**Name and Contact Data:** We collect your first, middle and last name, email address, bank verification number, postal address, phone number, signature, date of birth, an identification document such as a copy of driver's license, international passport, national identity card, and other similar contact data.

**Credentials:** when you subscribe to any of our products, particularly our e-channels products (online/mobile Banking, Instant Banking, Mvisa) you may be required to provide a User ID, a password, details from a token response device, password hints and similar security information used for authentication and account access. You may also be required or opt to use biometric identification to access your account and authenticate transactions. While this information is required to ensure that you carry out transactions securely, appropriate security measures have been implemented to protect these data including encryption and storage in a secured environment, if required.

**Payment Data:** If you subscribe to our ATM card products, we will issue you ATM cards each with unique numbers called Personal Access Number (PAN), Personal Identity Number (PIN), and Card Verification Number. You are required to keep your card and these security numbers from access by another person. For certain payment cards, a default PIN may be provided by us. In such circumstances, you are required to change the default PIN to a new PIN to enable activation and/or use of the card. When you carry out transactions or enrollment related to card services or online services, these card security numbers or any of them may be required for authentication.

We collect data necessary to process your payment if you make payment/transfers, such as your card number and the security code associated with your payment card. All payment data are processed, transmitted and stored securely in line with PCI DSS requirements.

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**Usage Data:** We may also collect information that your browser sends whenever you access our online services and or when you access the services by or through a mobile device ("Usage Data").

This Usage Data may include information such as your computer's Internet Protocol address (e.g. IP address), browser type, browser version, the pages of our Service that you visit, the time and date of your visit, the time spent on those pages, unique device identifiers and other diagnostic data.

When you access services by or through a mobile device, this Usage Data may include the following:

**Geo-Location information:** We may request access or permission to and track location-based information from your mobile device, either continuously or while you are using our mobile application, to provide location-based services. If you wish to change our access or permissions, you may do so in your device's settings.

**Mobile Device Access:** We may request access or permission to certain features from your mobile device, including your mobile device's camera, calendar, bluetooth, contacts, storage and other features. If you wish to change our access or permissions, you may do so in your device's setting.

**Mobile Device Data:** We may automatically collect device information (such as your mobile device ID, model and Manufacturer), operating system, version information, IP address and diagnostic data.

**Tracking & Cookies Data:** We use cookies and similar tracking technologies to track the activity on our Service

Cookies are files with small amount of data which may include an anonymous unique identifier. Cookies are sent to your browser from a



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website and stored on your device. Tracking technologies also used are beacons, tags, and scripts to collect and track information and to improve and analyze our Service.

You can instruct your browser to refuse all cookies or to indicate when a cookie is being sent. However, if you do not accept cookies, you may not be able to use some portions of our Service.

## **2.2. Use of Analytics to Collect/Monitor/Analyze Data**

We may use third-party Service Providers to monitor and analyze the use of our Service.

- **Google Analytics**

Google Analytics is a web analytics service offered by Google that tracks and reports website traffic. Google uses the data collected to track and monitor the use of our Service. This data is shared with other Google services. Google may use the collected data to contextualize and personalize the ads of its own advertising network.

For more information on the privacy policies of Google, please visit the [Google Privacy & Terms web page](https://policies.google.com/privacy?hl=en) located at <https://policies.google.com/privacy?hl=en>

- **Addthis**

Oracle Corporation operates AddThis.com, a social bookmarking service that can be integrated into a website with the use of a web widget. This is used to share content from our website to social media platforms such as Facebook, MySpace, Google Bookmarks, Pinterest, and Twitter.

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AddThis analytics also allow us to track how, where, and by whom our content is being shared. In addition, the analytics show follow activity, related posts performance, visits, and conversions.

You can prevent AddThis from using your information for analytics purposes by opting-out. To opt-out of AddThis service, please visit this page: <http://www.addthis.com/privacy/opt-out/>

For more information on what type of information AddThis collects, please visit the Terms of Use page of AddThis <http://www.addthis.com/privacy/terms-of-service/>

## **Links To Other Sites**

Our Service may contain links to other sites that are not operated by us. If 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.

## **2.3. Use of Data**

The purpose of collecting personally identifiable information is to enable us to provide you with the banking services you have subscribed to and ensure that you are able to carry out transactions without hitches.

The usage of data may be extended beyond the above whenever necessary for the purposes of meeting legal, regulatory, contractual obligations, and other legitimate business interests.

Specifically, the uses the Bank could put your data into include but not limited to:

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- To provide and maintain our services
  - To notify you about changes to our service
  - To allow you to participate in interactive features of our Service when you choose to do so
  - To provide customer care and support
  - To provide analysis or valuable information so that we can improve the Service
  - To monitor the usage of the Service
  - To detect, prevent and address technical issues
  - To facilitate account opening
  - To send you marketing and promotional communications for business purposes
  - To deliver targeted advertising to you for our Business Purposes and/or with your consent. We may use your information to develop and display content and advertising (and work with third parties who do so) tailored to your interests and or location and to measure its effectiveness

### **3. Transfer of Data**

The world today is interconnected and so is the provision of banking services. For instance, there could be many counterparties involved for a card transaction to be successfully completed. These include the personalization companies, the switching companies, processors, acquirers, merchants, and the card schemes. Certain personal data will traverse these parties in the normal course of carrying out transactions.

Save as related to the provision of banking services and meeting legal, regulatory, contractual, and other uses tangential or incidental to these, Fidelity will not share your personal data with a third party. Where it becomes necessary to do so, adequate security measures will be taken to protect the data from access by recipients other than those for which it is intended. All data we collect will reside in Fidelity's computer systems in Nigeria. Where cloud services are used, adequate governance measures that apply to such cloud services will be complied with.

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Fidelity Bank Plc will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Policy. No transfer of your Personal Data will take place to an organization or a country unless there are adequate controls in place including the security of your data and other personal information.

#### **4. Disclosure of Data**

We only share and disclose your information in the following situations:

**Compliance with Laws:** We may disclose your information where we are legally required to do so in order to comply with applicable law, governmental requests, a judicial proceeding, court order, or legal process, such as in response to a court order or a subpoena (including in response to public authorities to meet national security or law enforcement requirements).

**Vital interests and Legal Rights:** We may disclose your information where we believe it is necessary to investigate, prevent, or take action regarding potential violations of our policies, suspected fraud, situations involving potential threats to the safety of any person and illegal activities, or as evidence in litigation in which we are involved.

**Vendors, Consultants and Third-party Service Providers:** We may share your data with third party vendors, service providers, contractors or agents who perform services for us or on our behalf and require access to such information to do that work, which is necessary to provide the envisaged banking services. Examples include but not limited to: payment processing, data analysis, email delivery, hosting services, customer service and marketing efforts. For the purpose of service improvement, we may allow selected third parties to use tracking technology on the services which will enable them to collect data about how you interact with the services over time. This information may be used to, among other things, analyze and track data, determine the popularity of certain content and better understand online activity. Unless described in this policy, we do not

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share, sell, rent or trade any of your information with third parties for their promotional purposes.

**Business transfers:** we may share or transfer your information in connection with, or during negotiations of, any merger, sale of company assets, financing, or acquisition of all or a portion of our business to another company.

***With your consent we may disclose your personal information for any other purpose.***

## **5. Security of Data**

The security of your data is important to us. We have implemented appropriate technical and organizational security measures designed to protect the security of any personal information we process. However, please also remember that we cannot guarantee that the internet itself is 100% secure. Although we will do our best to protect your personal information, transmission of personal information to and from our services is at your own risk. You should only access the services within a secure environment.

## **6. Children's Privacy**

The Bank has a children's account called Sweetea. This account is opened and run by a child's parent or guardian until the child reaches the age of majority. All personal information pertaining to such account is provided by the guardian. A parent or guardian should therefore read this policy thoroughly to understand how the data provided is handled.

Other than as related to the operation of the aforementioned children's account, the Bank does not enter into banking relationship with minors (persons under the age of 18).

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We do not knowingly collect personally identifiable information from anyone under the age of 18. If you are a parent or guardian and you are aware that your Children have provided us with Personal Data, please contact us. If we become aware that we have collected Personal Data from children without verification of parental consent, we will take steps to remove that information from our servers.

## **7. Personal Data Retention Period**

We will only keep your personal information for as long as it is necessary for the purposes set out in this Privacy Policy, unless a longer retention period is required or permitted by law (such as tax, accounting or other legal requirements). Upon request for account closure, your account will be closed but this closure will not involve deletion of historical records of the account for the reasons already stated. However, except as may be required by law or law enforcement agents and or regulators, further processing of the personal information related to the account will cease from the time of closure.

## **8. Your Privacy Rights**

In some regions (like the European Economic Area), you have certain rights under applicable data protection laws. These may include the right (i) to request access and obtain a copy of your personal information, (ii) to request rectification or erasure; (iii) to restrict the processing of your personal information; and (iv) if applicable, to data portability. In certain circumstances as stated in section 2.8 of the Nigeria Data Protection Regulation, you may also object to the processing of your personal information. To make such a request, please use the contact details provided below. We will consider and act upon any request in accordance with applicable data protection laws.

If we are relying on your consent to process your personal information, you have the right to withdraw your consent at any time. Please note

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however that this will not affect the lawfulness of the processing before its withdrawal.

if you are resident in the European Economic Area and you believe we are unlawfully processing your personal information, you also have the right to complain to your local data protection supervisory authority. You can find their contact details here: [https://edpb.europa.eu/about-edpb/board/members\\_en](https://edpb.europa.eu/about-edpb/board/members_en)

## **Account Information**

If you would at any time like to review or change the information in your account or terminate your account, you can contact us using the contact information provided.

Cookies and Similar technologies: Most web browsers are set to accept cookies by default. If you prefer, you can usually choose to set your browser to remove cookies and to reject cookies. If you choose to remove cookies or reject cookies, this could affect certain features of our services to you. To opt-out of interest-based advertising by advertisers on our services visit <http://www.aboutads.info/choices/>

Opting out of email marketing: You can unsubscribe from our marketing email list at any time by clicking on the unsubscribe link in the emails that we send or by contacting us using the details provided below. You will then be removed from the marketing email list - however, we will still need to send you service-related emails that are necessary for the administration and use of your account. To otherwise opt-out, you may:

- Note your preferences when you register an account with the site
- Access your account settings and update preferences
- Contact us using the contact information provided

## **9. Automated individual decision-making or profiling**

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We do not use any automated processing systems for coming to specific decisions – including profiling.

## **10. 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 and making it available at our branches.

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.

## **11. Contact Us**

If you have any questions or comments about this policy, you may contact our Data Protection Officer (DPO) by email at [Compliance@fidelitybank.ng](mailto:Compliance@fidelitybank.ng) or by post to:

Data Protection Officer  
Fidelity Bank Plc  
2 Kofo Abayomi Street  
Victoria Island Lagos  
Nigeria

If you have any further questions or comments about us or our policies, email us at [true.serve@fidelitybank.ng](mailto:true.serve@fidelitybank.ng) or by post to:

Fidelity Bank Plc  
2 Kofo Abayomi Street  
Victoria Island Lagos  
Nigeria  
Phone: 014485252