

PRIVACY POLICY-BANCA

At Sterling Bank Limited, we take the privacy of your personal information seriously and remain committed to protecting and ensuring that your Personal Data is treated in a fair and lawful manner in all our dealings with you.

This Privacy Policy ("Policy") has been put together to explain to you what we do with the personal information that you provide to us when you download, access and use the BANCA platform (the "Service").

Throughout this document, "we", "us", "our" and/or "ours" refer to Sterling Bank Limited ("Sterling" or "the Bank") incorporated under the laws of the Federal Republic of Nigeria with its registered office at Sterling Towers, 20 Marina, Lagos. The reference to 'you' or 'your', means you, or any person authorized by you to access your account.

By continuing to use the BANCA platform via mobile application or website, you accept and consent to the provisions described in this Policy.

The information we will collect about you.

We gather information from you for a number of reasons. We may need you to provide your Personal Information/Data such as your name, contact details, identification, work and residential addresses, gender, positions held, forms submitted, Bank Verification Number (BVN), payment details and other enquiry details which would enhance your service experience. Your Personal Data we collect, fall into various categories, such as:

- **Details about your banking activities and transactions with us.**

This includes information on any bank accounts you use, debit card numbers, financial history, information you provide to deliver payment initiation services and account information services regarding accounts you hold with other providers.

- **Information on how you use your device/ Usage Data.**

We may also collect information that your browser sends whenever you visit our website or when you access the BANCA platform via 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 and the time spent on those pages amongst other diagnostic data. When you access the Service by or through a mobile device or use the mobile app, this Usage Data may include information such as the type of mobile device you use, your mobile device unique ID, the IP address of your mobile device, your mobile operating system, the type of mobile Internet browser you use, unique device identifiers and other diagnostic data.

- **Sensitive data**

We may hold information about you which includes without limitation to health, criminal conviction information or biometric information used to uniquely identify you. We will only hold this data when we need to for the purposes of the product we are provide to you, where we are required to process the data for a public interest purpose, or where we have a legal obligation or your consent to do so.

- **Information which you have consented to us using.**

We may collect information about your marketing preferences to help us share with you information about relevant services, products and offers that we think may be of interest to you.

- **Tracking and Cookies Data**

We use cookies and similar tracking technologies to track the activity on our Service and hold certain information. Cookies are files with small amounts of data which may include an anonymous unique identifier. Cookies are sent to your browser from a 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. You can also refuse permission to read your phone data by the mobile application. However, if you do not accept cookies on your browser or allow permissions on your mobile device, our online service experience to you may be degraded and you may not be able to use some portions of our Service. We may also collect information about your internet browser settings and Internet Protocol (IP) address and other relevant information to help us identify your geographic location when providing you with our services.

How we use your personal Information

To the extent permissible under applicable law, we may use your information for the following legitimate actions:

- Determine your eligibility for our products and services.
- Verify your identity when you access your account information.
- Administer your accounts or other products and services that we or our partners/affiliates may provide to you.
- Respond to your requests and communicate with you.
- For understanding your financial needs
- Prevention of crime, fraud, money laundering or terrorism financing activities
- Managing our risks
- Reviewing your request for credit or loan eligibility.
- For marketing the products and services of Sterling, related entities and affiliates. We may send you marketing and promotional messages by post, email, telephone, text, secure messaging, Mobile app, or through our social media channels. You can change your mind on how you wish to receive marketing messages from us or opt out of receiving such messages at any time. However, we will continue to use your contact details to send you important information regarding your dealings with us.
- Process transactions, design products and profile customers
- Notify you about changes to our Services.
- Allowing you to participate in interactive features of our Services when you choose to do so
- Provide customer care and support and for internal operations, including troubleshooting, data analysis, testing, security, fraud-detection, and account management.
- Process your information for audit, statistical or research purposes in order to help us understand trends in our customer behaviour and to understand our risks better and curate products and services that are suitable to our customers' needs.
- Monitor our conversation with you when we speak on the telephone (for example, to check your instructions to us, to analyse, to assess and improve customer service; for training and quality assurance purposes; for verification, fraud analysis and prevention purposes)

- Recover any debts that you may owe us.
- Carry out analysis to evaluate and improve our business.
- Monitor the usage of our Services.
- Detect, prevent and address technical issues.
- Prevent fraud and enhance security of your account or our service platform.
- Comply with and enforcing applicable legal and regulatory requirements, relevant industry standards, contractual obligations and our policies.
- Provide you with tailored content and marketing messages such as recommending other products or services we believe you may be interested in
- For other purposes required by law or regulation

How we may share your Personal Information

We may share your personal information with:

- Our affiliates and/or subsidiaries we control, but only for purposes allowed by this document.
- Law enforcement, government officials, or other third parties if we are compelled to do so by a subpoena, court order or similar legal procedure, when it is necessary to do so to comply with law, or where the disclosure of personal information is reasonably necessary to prevent physical harm or financial loss, to report suspected illegal activity, or to investigate violations of a User of the Platform;
- Third party service providers who assist us in providing the services on the Platform to you, whether payment service or otherwise.
- deliver targeted advertising, marketing (which may include in-product messaging) or information to you which may be useful to you, based on your use of our application and website;

We may also disclose your Personal Information in the good faith and belief that such action is necessary in any of the following circumstances:

- We have your consent to share the information.
- To comply with a legal obligation.
- To bring you improved service across our array of products and services, when permissible under relevant laws and regulations, by disclosing your personal information with the Bank's affiliated websites and businesses.
- To protect and defend the rights or property of the Bank.
- To prevent or investigate possible wrongdoing in connection with the Service.
- To protect the personal safety of users of our Service or the public.
- To protect against legal liability.
- We find that your actions on our web sites or banking applications violate any part of

How we secure your Information

We have implemented appropriate organizational and technical measures to keep your personal information/data, confidential and secure. This includes the use of encryption, access controls and other forms of security to ensure that your data is protected. We require all parties including our staff and third-parties processing data on our behalf to comply with relevant policies and guidelines. Where you have a password which grants you access to specific areas on our site or to any of our services, you are responsible for keeping this password confidential. We request that you do not share your password or other authentication details (e.g. token generated codes, PIN or Passwords) with anyone.

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 your personal information with us is valid, accurate and up to date. If we receive instructions using your account login information, we will consider that you have authorized the instructions and we will process the instruction accordingly, and without incurring any liability for doing so.

How long do we keep your information.

We retain your Information for as long as the purpose for which the information was collected continues. The information is then securely destroyed unless its retention is required to satisfy legal, regulatory, internal compliance or accounting requirements or to protect Sterling's interest.

Please note that regulations may require Sterling to retain your personal data for a specified period even after the end of your banking relationship with us.

Information from locations outside Nigeria

If you are located outside Nigeria and choose to provide information to us, please note that the data, including personal data, will be processed in Nigeria. Your consent to this Privacy Policy followed by your submission of such information represents your agreement to that transfer.

Accuracy and update of your Information

You are responsible for making sure the information provided to the Bank is accurate and should inform the Bank on any changes as it occurs, this will enable us to update your information with us.

Any changes will affect only future uses of your Personal Information. Subject to applicable law, which might, from time to time, oblige us to store your Personal Information for a certain period, we will respect your wishes to correct inaccurate information. Otherwise, we will hold your Personal Information for as long as we believe it will help us achieve our objectives as detailed in this Privacy Policy.

Your Rights

You have certain rights in relation to the personal data we collect as provided by the Nigeria Data Protection Regulation 2019 (NDPR), these rights include:

- A right to access your personal data.
- A right to rectify/update your information in our possession.
- A right to request the erasure of personal data.
- A right to withdraw your consent to processing of personal data. This will however not affect the legality of processing carried out prior to any such withdrawal.
- Right to object to processing of personal data. This will only be applicable where there are no legal or operational reasons.
- 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.

These rights are however subject to certain limitations as provided in the NDPR.



Privacy of minors

We do not knowingly collect names, email addresses, or any other personally identifiable information from children. The BANCA service is only available to persons who are 18 years old and above, or persons who have attained the age of majority in their respective jurisdictions. If you are a parent or guardian and you are aware that your child has provided us with personal data without our knowledge and without the requisite parental consent, please promptly contact us.

Social Media Platforms

We operate and communicate through our designated pages and accounts on some social media platforms to communicate and engage with our customers. We monitor and record comments and posts made about us or BANCA on these channels so that we can improve the Service. The general public can access and read any information posted on these sites. Please note that any content you post to such social media platforms is subject to the applicable social media platform's terms of use and privacy policies. We recommend that you review the information carefully in order to better understand your rights and obligations regarding such content.

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.

Third Party Websites

The BANCA website and mobile applications may have links to or from other websites that are not operated by us. We have no control over and assume no responsibility for the security, privacy practices or content of third-party websites or services. We recommend that you always read the privacy and security statements on these websites.

Service Providers

We may employ third party companies and individuals to facilitate the Service ("Service Providers"), on our behalf, to perform specific Service-related roles or to assist us in analyzing how the Service is used. These third parties have access to your Personal Data only to perform these tasks on our behalf and are obligated not to disclose or use it for any other purpose outside of the service-specific need for which the data is required.

Changes to this Policy

This Privacy Policy is effective as of the date stated above and will remain in effect except with respect to any changes in its provisions in the future, which will be in effect immediately after being posted on our website.

Based on the changing nature of privacy laws, user needs and our business, we may modify this Privacy Policy from time to time. Any change to our privacy policy will be communicated on our website, via email or by placing a notice on our Platform and this will be effective as soon as published and we will need not notify you of the change.

We encourage periodic reviews of this Privacy Policy for awareness of any changes that may have occurred. Your continued use of the Services after we post any modifications to the Privacy Policy on our website will constitute your acknowledgment of the modifications and your consent to abide and be bound by the modified Privacy Policy.



Contact Us

We are committed to resolving your privacy complaints and concerns as quickly as possible and have procedures in place to help resolve any problems or complaints efficiently. If you have any questions about this Privacy Policy, please contact us at bancasupport@sterling.ng or call +234 07008220000.