

PRIVACY POLICY

Effective Date: September 23, 2025

About OneBank

OneBank is a 100% digital banking application (“App” or “OneBank”) developed and operated by Sterling Bank Limited (“Sterling”, “us”, “we”, “our” or “the Bank”) to enable convenient, safe and secure financial transactions necessary for everyday life functions such as, Bills payments, transfer, airtime purchase etc. We are committed to treating and using your personal information responsibly while you engage the app.

We have developed this Privacy Policy to explain how we collect, retain, process, discount and transfer your personal data when you use the Services and the choices you have associated with that data. Services under this Policy shall mean any of our products, services, content, features, technologies, or functions, and all related websites, and services offered to you on or through the App).

By using the App, you agree to the collection and use of your personal information in accordance with this policy.

What constitutes Personal Data?

Personal Data under these terms means your personal information that can be associated with you as an identifiable person or identifies you as a specific individual. Personal Data includes but is not limited to; your name, address, telephone number, email address, payment card number, account number, date of birth, identification card number etc.

What personal Data do we collect?

We may collect different information from you as you access and use the App, including the following information:

- **Onboarding Information**

When you sign up to the App and provide your details such as Name, Identification Number (passport data page, national ID or Drivers’ license), biometric data/BVN, Business Tax Identification Number, passport photograph, residential address, email address, phone number, voice recordings (when you call our helpline) and other details which would help us enhance your service experience:

- **Transaction Information**

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.

- **Device and Usage Data**

We may also collect information that your browser sends whenever you visit our Service or when you access the Service 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 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.

- **Face Data**

We may collect and process your facial images and facial feature details through facial matching image and liveness check ("Face Data"), when you access and interact with the services on the App. This Face Data is used to verify your identity to ensure the authenticity of the person accessing or performing certain transactions or activities on the App.

- **Tracking & 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 amount 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 permissions 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.

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 particular 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.

- **Information from social networks or online accounts**

Information from any social media profiles or any accounts that you share with us.

- **Information that you choose to provide us to obtain additional services**

If you request for specific services on the app, or request enhanced services or other elective functionality, we may collect additional information from you.

- **Other information**

We may also process specific categories of information for specific and limited purposes, such as detecting and preventing financial crime or making our services available to customers. We will only treat particular types of information where we have obtained your explicit consent or are otherwise lawfully permitted to do so.

Why we collect Your information

We will take all steps reasonably necessary to ensure that your information is treated securely and in accordance with this Privacy Policy and no transfer of your Personal Data will take place to a third party or a country without notice to you and adequate controls in place including the security of your data and other personal information.

We may disclose your Personal Data in the good faith and belief that such action is necessary and will not disclose your Personally Information to anyone except in any of the following circumstances:

To the extent permissible under applicable law, we may use your information to:

- provide, maintain, protect and improve the App, products, services and information that you may have requested from us;
- manage risks and protect the App, the Services and you from fraud by verifying your identity;
- undertake internal testing of the App, systems and services to test and improve their security, provision and performance, in which case, we would pseudonymise any information used for such purposes, and ensure it is only displayed at aggregated levels which will not be linked back to you or any living individual;
- enable the use of any partner service and facilities securely and to enable us deliver the services you have requested;
- address any issue(s) or concerns you have raised
- enable us take your suggestion on what you may be interested in;
- contact you to see if you would like to take part in our customer research (for example, feedback on your use of the App, products and Services);
- provide the services any customer support you may request;
- process transactions and send notices about our products and services, including promotional messages about such products and services;
- resolve disputes, collect fees, and troubleshoot problems;
- prevent potentially fraudulent, prohibited or illegal activities, and enforce these terms;

- create an account connection between your account and any third-party account;
- customize, personalize, measure, and improve our services and the content and layout of the App for your bespoke user experience;
- send you updates about new products and services that we are offering to our customers;
- compare information for accuracy and verify it with third parties; and
- perform other duties as required by law

How we use the information collected

We use the collected data for various purposes such as to:

- verify your identity when you access your account information
- respond to your requests and communicate with you
- provide and maintain the Service
- process transactions, design products and profile customers
- notify you about changes to our Service
- allow you to participate in interactive features of our Service when you choose to do so
- provide customer care and support and for internal operations, including troubleshooting, data analysis, testing, research, security, fraud-detection, and account management
- provide analysis or valuable information so that we can improve the Service
- monitor the usage of the Service
- detect, prevent and address technical issues
- prevent fraud and enhance security of your account or our service platform.
- comply with and enforce applicable legal and regulatory requirements, relevant industry standards, contractual obligations and our policies
- provide you with tailored content and promotional messages such as recommending services we believe you may be interested in

Information from locations outside Nigeria

If you are located outside Nigeria and choose to provide information to us, please note that the data, including your 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.

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 the App;
- Third party Service Providers who assist us in providing services 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 applications and services;

Our OneBank mobile application and Services on the App may contain technology that enables us to:

- check specific information from your device or systems directly relevant to your use of the App or Services against our records to make sure the App or Services are being used in accordance with the terms and conditions for the use of the App and to troubleshoot any problems;
- obtain information relating to any technical errors or other issues with the App and Services;
- comply with our legal or regulatory obligations;
- collect information about how you and users use the functions of the features of our App; and
- gather statistical information about the operating system and environment from which you access the App services.

We keep Face Data concerning you confidential, and will not disclose or transfer it to third-parties except to our subsidiaries or affiliates as account information mandate only, to be utilized for identity verification purposes to prevent unauthorized access to your Account or to prevent fraud on your Account.

How long we will keep 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 App, remain validly subscribed to our newsletter or partake in surveys. Once our relationship with you has come to an end (e.g. following closure of your account), or cancellation of your subscription to the Service), we will not gather or collect any new information about you We will also retain your Personal Data in order to comply with any legal or regulatory requirements.

We retain your Face Data in our system for as long as you maintain your account with us. However, when we are no longer permitted by the applicable laws to store your Face Data, we will remove it from our systems and records. We may also retain your Face Data for a longer duration, such as until the end of legal action or if required by the applicable laws or if specific Face Data are required to be retained in order to deal with an incident or in order to respond to a request by made under the law.

How do we secure your personal information

The security of your data is important to us, for this reason, we maintain technical, physical, and administrative security measures designed to provide reasonable protection for your Personal Data against loss, unauthorized access, disclosure, and misuse. We adopt security measures such as firewalls, data encryption, and information access authorization controls amongst other security protocols to ensure the safety of your data. We are however aware that no method of transmission over the Internet, or method of electronic storage can guarantee 100% security at all times. 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.

We are not responsible for protecting any Personal Data that we share with a third-party based on an account connection that you have authorized.

If we learn of a system's security breach, we may attempt to notify you electronically so that you can take appropriate protective steps.

If we receive instructions using your OneBank account login information, we will consider that you have authorized the instructions and process your instruction accordingly without incurring any liability for doing so. We reserve the right, in our sole discretion, to refuse to provide our services, terminate OneBank accounts, and to remove or edit content.

Service Providers

We may employ third party companies and individuals to facilitate our Service ("Service Providers"), to provide the Service on our behalf, to perform specific Service-related roles or to assist us in analyzing how our 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.

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. You should note the privacy policy, terms of use and security practices of the linked third-party website before providing any information on that website.

Can Minors access the Services on the App?

Our Services do not address anyone under the age of 18 ("Children").

We do not knowingly collect personally identifiable information from anyone under the age of 18 years. 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 erroneously collected Personal Data from children without verification of parental consent, we will promptly remove such information from our servers.

Update of your personal information

You must notify us of any change in your Personal Information by updating your account profile through our Services. 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 under this Policy

In accordance with the Nigerian Data Protection Regulation, in certain circumstances you have the following rights:

- the right to be told how we use your information and obtain access to your information.
- the right to have your information rectified or erased or place restrictions on processing your information.
- the right to object to the processing of your information e.g., for direct marketing purposes or where the processing is based on our legitimate interests;
- the right to give and withdraw consent to the processing of your personal information. We may however be unable to provide some services that you may request unless your consent to process your Personal Data is obtained.

Changes to this Privacy Policy

We may update our Privacy Policy from time to time and revise these terms from time to time to reflect changes to our business, the App, our Services, applicable laws, regulations or market trends. The revised Privacy Statement will be effective as of the published effective date.

If the revised version includes a substantial change, we may provide you with 10 days' prior notice by posting notice of the change on our website or the App, or notify users of the change using email or other means.

Your continued use of the App after we post any modifications to the Privacy Policy 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 customercare@sterling.ng or call +234 07008220000.