



FIRST NATIONAL BANK CUSTOMER PRIVACY NOTICE

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1 INTRODUCTION

This important document explains how First National Bank Ghana Ltd and any of its associates, cessionary, delegates or successors in title or appointed third parties such as its authorized agents, advisors, partners and contractors and the FirstRand Group will process your personal information.

Where we refer to “process”, it means how we collect, use, store, make available, destroy, update, disclose, or otherwise deal with your personal information. As a general rule we will only process your personal information if this is required to deliver or offer a service, provide a product or carry out a transaction with you. We respect your privacy and will treat your personal information confidentially.

We may combine your personal information and use the combined personal information for any of the purposes stated in this Privacy Policy.

In this document, the ‘bank’ refers to First National Bank Ghana Ltd.

In this document any reference to “we” or “us” or “our” refers to First National Bank Ghana.

2 SCOPE

This notice applies to First National Bank Ghana Ltd (FNBG). The bank offers solutions that are financial and non-financial in nature. These solutions include transactional, lending, investment, insurance, and consumer products, goods and services. In this notice solution means any product, service or goods offered by the bank whether financial or non-financial in nature.

3 DEFINITIONS

In this notice, references to the bank’s platform means the platform provided by FNBG which is a collection of capabilities, including that of the bank’s agents and independent third-party service providers.

For the purpose of this notice a “customer” includes:

- prospective customers (persons who are interested in the bank’s solutions or to whom the bank may be offering or promoting products or services solutions);
- new and existing customers (persons who have taken up bank solutions);
- previous customers (persons who previously had taken up bank solutions); and
- users (persons who use bank platforms, customer interfaces or channels).

Examples provided in this notice are for illustrative purposes and are not exhaustive.

4 BACKGROUND AND PURPOSE OF THIS NOTICE

Protecting customers’ personal information is important to FNBG. To do so, it follows general principles in accordance with applicable privacy laws.

The bank has developed this customer privacy notice (notice) to enable its customers understand how the bank collects, uses, and safeguards their personal information.

The bank collects personal information about its customers. This includes what customers tell the bank about themselves, what the bank learns by having a customer or when a customer makes use of a solution or interacts with the bank's platform through various interfaces and channels, as well as the choices customers make about the marketing they elect to receive. This notice also outlines customers' privacy rights and how the law protects customers.

In terms of applicable privacy laws, this notice may also apply on behalf of other third parties (such as authorised agents and contractors), acting on the bank's behalf when providing customers with solutions. If FNBG processes personal information for another party under a contract or a mandate, however, the other party's privacy policy or notice will apply.

In this notice "process" means how the bank collects, uses, stores, makes available, destroys, updates, discloses, or otherwise deals with customers' personal information. The bank respects customers' privacy and will treat their personal information confidentially.

The bank may combine customers' personal information (across the bank's platform, interfaces, channels or companies) and use the combined personal information for any of the purposes stated in this notice.

VERY IMPORTANT: If customers use the bank's platform, bank solutions or service channels (including both assisted and unassisted interactions), or by accepting any rules, agreement, contract, mandate or annexure with the bank, or by utilising any solutions offered by the bank, customers agree that in order to:

- conclude and fulfil contractual terms or obligations to a customer;
- comply with obligations imposed by law; or
- to protect or pursue customers', the bank, or a third party's legitimate interests, including designing and offering solutions that best meet customers' needs;

customers' personal information may be processed through centralised functions and systems across the bank and may be used for the purposes, in the manner, and with the appropriate controls as set out in this notice.

Where it is necessary to obtain consent for processing, the bank will seek customers' consent separately. Customers should read the consent request carefully as it may limit their rights. A customer may maintain their consent preferences on the bank's platform.

The bank may change this notice from time to time if required by law or its business practices. Where the change is material, the bank will notify customers and will allow a reasonable period for customers to raise any objections before the change is made. Please note that the bank may not be able to continue a relationship with a customer or provide customers with certain solutions or permit access to the bank's platform if they do not agree to the changes.

The latest version of the notice displayed on FNBG's website will apply to customers' interactions with the bank and is available at: (Insert link to Notice on the FNBG site)

RESPONSIBLE PARTIES

The bank has several responsible parties. These parties or companies are responsible for determining why and how the bank will use customers' personal information. When a customer uses the bank's platform, the responsible party would be the company that provides the platform, acting jointly with the other companies.

5 WHAT IS PERSONAL INFORMATION?

Personal information refers to any information that identifies a customer or specifically relates to a customer. Personal information includes, but is not limited to, the following information about a customer:

- marital status (married, single, divorced); national origin; age; language; birth; education;
- financial history (e.g. income, expenses, obligations, assets and liabilities or buying, investing, lending, insurance, banking and money management behaviour or goals and needs based on, amongst others, account transactions);
- employment history and current employment status (for example when a customer applies for credit);
- gender or sex (for statistical purposes as required by the law);
- identifying number (e.g. an account number, identity number or passport number);
- e-mail address; physical address (e.g. residential address, work address or physical location); telephone number.
- information about a customer's location (e.g. geolocation or GPS location);
- online identifiers (e.g. cookies, online analytical identifier numbers, internet protocol (IP) addresses, device fingerprints, device ID); social media profiles;
- biometric information (e.g. fingerprints, signature, facial biometrics or voice);
- race (for statistical purposes as required by the law);
- physical health; mental health; wellbeing; disability; religion; belief; conscience; culture;
- medical history (e.g. HIV/AIDS status); criminal history; employment history;
- personal views, preferences and opinions.
- confidential correspondence; or
- another's views or opinions about a customer and a customer's name also constitute personal information.

There is also a category of personal information called **special personal information**, which includes the following personal information about a customer:

- religious and philosophical beliefs (for example where a customer enters a competition and is requested to express a philosophical view);
- race (e.g. where a customer applies for a solution where the statistical information must be recorded);
- ethnic origin.

- trade union membership.
- political beliefs.
- health including physical or mental health, disability and medical history (e.g. where a customer applies for an insurance policy);
- biometric information (e.g. to verify a customer's identity); or
- criminal behaviour where it relates to the alleged commission of any offence or the proceedings relating to that offence.

6 WHEN WILL THE BANK PROCESS CUSTOMERS' PERSONAL INFORMATION?

The bank may process customers' personal information for lawful purposes relating to its business if the following circumstances apply:

- it is necessary to conclude or perform under a contract the bank has with the customer or to provide the solution to the customer.
- the law requires or permits it.
- it is required to protect or pursue the legitimate interest of the customer, the bank or a third party to whom data is supplied.
- the customer has consented thereto.
- a person legally authorised by the customer, the law or a court, has consented to the processing; or
- the customer is a child and a competent person (such as a parent or guardian) has consented thereto on their behalf.

7 WHEN WILL THE BANK PROCESS CUSTOMERS' SPECIAL PERSONAL INFORMATION?

The bank may process customers' special personal information in the following circumstances, among others:

- if the processing is needed to create, use or protect a right or obligation in law (for the purpose of or in connection with a legal proceeding, to obtain legal advice, for the establishment, exercise or defence of legal rights)
- if the processing is for statistical or research purposes, and all legal conditions are met;
- if the special personal information was made public by the customer;
- if the processing is required by law;
- if racial information is processed and the processing is necessary for the identification and elimination of discriminatory practices, and carried out with appropriate safeguards for the rights and freedoms of the data subject.
- if health information is processed, and the processing is to determine a customer's insurance risk, or to perform under an insurance policy, or to enforce an insurance right or obligation; or
- if the customer has consented to the processing.

8 WHEN AND HOW WILL THE BANK PROCESS THE PERSONAL INFORMATION OF CHILDREN?

A child is a person who is defined as a child by a country's legislation, and who has not been recognised as an adult by the courts. The Children's Act, 1998, Act 560 Section 1 defines a child as "a person below the age of eighteen years."

The bank processes the personal information of children if the law permits this.

The bank may process the personal information of children if any one or more of the following applies:

- a person with the ability to sign legal agreements has consented to the processing, being the parent or guardian of the child.
- the processing is needed to create, use or protect a right or obligation in law, such as where the child is an heir in a will, a beneficiary of a trust, a beneficiary of an insurance policy or an insured person in terms of an insurance policy.
- the child's personal information was made public by the child, with the consent of a person who can sign legal agreements.
- the processing is for statistical, or research purposes and all legal conditions are met;
- where the subject is legally old enough to open a bank account without assistance from their parent or guardian.
- where the subject is legally old enough to sign a document as a witness without assistance from their parent or guardian; or
- where the child benefits from a bank account such as an investment or savings account and a person with the ability to sign legal agreements has consented to the processing.

9 WHEN, AND FROM WHERE, DOES THE BANK OBTAIN PERSONAL INFORMATION ABOUT CUSTOMERS?

The bank collects information about customers:

- directly from customers.
- based on the customers' use of the bank's platform (e.g. behavioural information derived from interaction and movements on the bank's platform);
- based on customers' use of bank solutions or service channels (such as websites, applications (apps) and ATMs, including both assisted and unassisted customer interactions) as applicable.
- based on how customers engage or interact with the bank, such as on social media, and through emails, letters, telephone calls and surveys.
- based on a customer's relationship with the bank;
- from public sources (such as newspapers, company registers, online search engines, deed registries, public posts on social media, public directories);
- from technology, such as a customer's access and use including both assisted and unassisted interactions (e.g. on the bank's websites and mobile apps) to access and engage with the bank's platform (this includes cookies and online or app analytics);

- customers' engagement with bank advertising, marketing and public messaging; and
- from third parties that the bank interacts with for the purposes of conducting its business (such as approved business partners who are natural or juristic persons holding a business relationship with the bank, where such relationship does not fall within the category of a supplier, employee or customer relationship, e.g. insurers, and dealers to offer customers assets, insurance products or other value-added solutions), reward partners, list providers, marketing list or lead providers, the bank's customer loyalty rewards programmes' retail and online partners, credit bureaux, regulators and government departments or service providers).

The bank collects and processes customers' personal information at the start of, and for the duration of their relationship with the bank. The bank may also process customers' personal information when their relationship with the bank has ended.

If the law requires the bank to do so, it will ask for customer consent before collecting personal information about them from third parties.

The third parties (which may include parties the bank engages with as independent responsible parties, joint responsible parties or operators) from whom the bank may collect customers' personal information include, but are not limited to, the following:

- members of the bank any connected companies, subsidiary companies, its associates, cessionary, delegates, assignees, affiliates or successors in title and/or appointed third parties (such as its authorised agents, partners, contractors and suppliers) for any of the purposes identified in this notice;
- the financial services and product providers of the bank, including representatives and intermediaries.
- the customer's spouse, dependants, partners, employer, joint applicant, account or card holder, authorised signatories or mandated persons, beneficiaries and other similar sources.
- people the customer has authorised to share their personal information, such as a person that makes a travel booking on their behalf, or a medical practitioner for insurance purposes.
- attorneys, tracing agents, debt collectors and other persons that assist with the enforcement of agreements.
- payment processing services providers, merchants, banks and other persons that assist with the processing of customers' payment instructions, such as card scheme providers (including VISA or MasterCard);
- insurers, brokers, other financial institutions or other organisations that assist with insurance and assurance underwriting, the providing of insurance and assurance policies and products, the assessment of insurance and assurance claims, and other related purposes.
- law enforcement and fraud prevention agencies, and other persons tasked with the prevention and prosecution of crime.
- regulatory authorities, industry ombuds, government departments, and local and international tax authorities.
- credit bureaux.
- financial services exchanges.
- qualification information providers.
- trustees, executors or curators appointed by a court of law.

- payment or account verification service providers.
- the bank's service providers, agents and subcontractors, such as couriers and other persons the bank uses to offer and provide solutions to customers.
- courts of law or tribunals.
- participating partners, whether retail or online, in the bank's customer rewards programmes.
- the bank's business partners.
- marketing list or lead providers.
- social media platforms.
- the user of a sim card, who is not the subscriber of the sim card, where telecommunication services are provided; or
- online search engine providers.

10 REASONS THE BANK NEEDS TO PROCESS CUSTOMERS' PERSONAL INFORMATION

The bank may process customers' personal information for the reasons outlined below.

10.1 Contract

The bank may process customers' personal information if it is necessary to conclude or perform under a contract the bank has with a customer or to provide a solution to a customer. This includes:

- to assess and process applications for solutions.
- to assess the bank's lending and insurance risks.
- to conduct affordability assessments, credit assessments and credit scoring.
- to conduct a needs analysis so that the correct solution meeting the customer's needs and circumstances may be provided.
- to provide a customer with solutions they have requested.
- to open, manage and maintain customer accounts or relationships with the bank;
- to enable the bank to deliver goods, documents or notices to customers.
- to communicate with customers and carry out customer instructions and requests.
- to respond to customer enquiries and complaints.
- to enforce and collect on any agreement when a customer is in default or breach of the terms and conditions of the agreement, such as tracing a customer, or to institute legal proceedings against a customer. In such scenario the bank may aggregate the contact details provided to any of the companies in the bank to determine the customer's most accurate contact details in order to enforce or collect on any agreement the customer has with the bank;
- to disclose and obtain personal information from credit bureaux regarding a customer's credit history.
- to meet record-keeping obligations.
- to conduct market and behavioural research, including scoring and analysis to determine if a customer qualifies for solutions, or to determine a customer's credit or insurance risk.

- to enable customers to participate in and make use of value-added solutions.
- to enable customers to participate in customer rewards programmes: determine customer qualification for participation, rewards points, rewards level, and monitor customer buying behaviour with the bank's rewards partners to allocate the correct points or inform customers of appropriate solutions they may be interested in, or to inform the bank's reward partners about a customer's purchasing behaviour.
- to enable the sale and purchase of and payment for goods in the bank's digital marketplaces.
- travel bookings, payments and arrangements.
- customer satisfaction surveys, promotional and other competitions.
- insurance and assurance underwriting and administration.
- to process or consider or assess insurance or assurance claims.
- to provide insurance and assurance policies, products and related services.
- security and identity verification, and to check the accuracy of customer personal information.
- to provide telecommunication, data and SIM card products and services; or
- for any other related purposes.

10.2 Law

The bank may process customers' personal information if the law requires or permits it. This includes:

- to comply with legislative, regulatory, risk and compliance requirements (including directives, sanctions and rules).
- to comply with voluntary and involuntary codes of conduct and industry agreements.
- to ensure that customers are treated fairly and to comply with conduct standards issued by market conduct authorities.
- to fulfil reporting requirements and information requests.
- to process payment instruments and payment instructions (such as a debit order);
- to create, manufacture and print payment instruments and payment devices (such as a debit card);
- to meet record-keeping obligations.
- to detect, prevent and report theft, fraud, money laundering, corruption and other crimes. This may include the processing of special personal information, such as alleged criminal behaviour or the supply of false, misleading or dishonest information when opening an account with the bank, or avoiding liability by way of deception, to the extent allowable under applicable privacy laws. The Anti Money Laundering Act obliges the bank to collect personal and special personal information from customers and other third parties, to process personal and special personal information and further process personal and special personal information for the purposes of financial crime detection, prevention and reporting. The processing of personal information and special personal information may happen when customers transact, establish a relationship with the bank and when utilising bank solutions.
- to conduct market and behavioural research, including scoring and analysis to determine if a customer qualifies for solutions, or to determine a customer's credit or insurance risk;

- to enable customers to participate in and make use of value-added solutions (e.g. the payment of traffic fines, renewal of vehicle licences, etc.);
- to enable customers to participate in customer rewards programmes: determine customer qualification for participation, rewards points, rewards level, and monitor customer buying behaviour with the bank's rewards partners to allocate the correct points or inform customers of appropriate solutions they may be interested in, or to inform the bank's reward partners where applicable about a customer's purchasing behaviour;
- for customer satisfaction surveys, promotional and other competitions.
- to assess the bank's lending and insurance risks.
- to conduct affordability assessments, credit assessments and credit scoring.
- to disclose and obtain personal information from credit bureaux regarding a customer's credit history;
- to develop credit models and credit tools.
- for insurance and assurance underwriting and administration.
- to process or consider or assess insurance or assurance claims.
- to provide insurance and assurance policies and products, and related services.
- to give effect to and adhere to legislation governing various protected relationships (e.g. civil unions, marriages, customary marriages); or
- for any other related purposes.

10.3 Legitimate interest

The bank may process customers' personal information in the daily management of its business and finances and to protect the bank's customers, employees, service providers and assets. It is to the bank's benefit to ensure that its procedures, policies and systems operate efficiently and effectively.

The bank may process customers' personal information to provide them with the most appropriate solutions and to develop and improve bank solutions, business and its platform.

The bank may process a customer's personal information if it is required to protect or pursue their, the bank's or a third party's legitimate interest. This includes:

- to develop, implement, monitor and improve the bank's business processes, policies and systems.
- to manage business continuity and emergencies.
- to protect and enforce the bank's rights and remedies in the law.
- to develop, test and improve solutions for customers, this may include connecting customer personal information with other personal information obtained from third parties or public records to better understand customer needs and develop solutions that meet these needs. The bank may also consider customer actions, behaviour, preferences, expectations, feedback and financial history.
- tailoring solutions which would include consideration of a customer's use of third-party products, goods and services and marketing of appropriate solutions to the customer, including marketing on the bank's own or other websites, mobile apps and social media.

- to market bank solutions to customers via various means including on bank and other websites and mobile apps including social media, as well as tele-, postal- and in-person marketing.
- to market business partner solutions via various means.
- to respond to customer enquiries and communications including the recording of engagements and analysing the quality of the bank's engagements with a customer.
- to respond to complaints including analytics of complaints to understand trends and prevent future complaints and providing compensation where appropriate.
- to enforce and collect on any agreement when a customer is in default or breach of the terms and conditions of the agreement, such as tracing the customer, or to institute legal proceedings against the customer. In such a scenario, the bank may aggregate the contact details provided to any of the companies in the bank to determine the customer's most accurate contact details in order to enforce or collect on any agreement the customer has with the bank.
- to process payment instruments and payment instructions (such as a debit order);
- to create, manufacture and print payment instruments and payment devices (such as a debit card);
- to meet record-keeping obligations.
- to fulfil reporting requirements and information requests.
- to comply with voluntary and involuntary codes of conduct and industry agreements.
- to detect, prevent and report theft, fraud, money laundering, corruption and other crimes. This may include the processing of special personal information, such as alleged criminal behaviour or the supply of false, misleading or dishonest information when opening an account with the bank, or avoiding liability by way of deception, to the extent allowable under applicable privacy laws. This may also include the monitoring of the bank's buildings including CCTV cameras and access control.
- to conduct market and behavioural research, including scoring and analysis to determine if a customer qualifies for solutions, or to determine a customer's credit or insurance risk.
- for statistical purposes, such as market segmentation or customer segments (that is placing customers in groups with similar customers based on their personal information);
- to enable customers to participate in customer rewards programmes: determine customer qualification for participation, rewards points, rewards level, and monitor customer buying behaviour with the bank's rewards partners to allocate the correct points or inform customers of appropriate solutions they may be interested in, or to inform the bank's reward partners about a customer's purchasing behaviour.
- for customer satisfaction surveys, promotional and other competitions.
- to assess the bank's lending and insurance risks.
- to disclose and obtain personal information from credit bureaux regarding a customer's credit history.
- to develop credit models and credit tools.
- for any other related purposes.

11 WHY DOES THE BANK FURTHER USE OR PROCESS CUSTOMERS' PERSONAL INFORMATION?

At the time that the bank collects personal information from a customer, it will have a reason or purpose to collect that personal information. In certain circumstances, however, the bank may use that same personal information for other purposes. The bank will only do this where the law allows it to and the other purposes are compatible with the original purpose/s applicable when the bank collected the customer's personal information. The bank may also need to request a customer's specific consent for the further processing in limited circumstances. Examples of these other purposes are included in the list of purposes set out in section 10 above.

The bank may also further use or process a customer's personal information if:

- the personal information about the customer was obtained from a public record, like the deed's registry;
- the customer made the personal information public, like on social media.
- the personal information is used for historical, statistical or research purposes, the results will not identify the customer.
- proceedings have started or are contemplated in a court or tribunal.
- it is in the interest of national security.
- if the bank must adhere to the law, specifically tax legislation; or
- the Data Protection Commission has exempted the processing.

The bank may also further use or process a customer's personal information if the customer has consented to it or in the instance of a child, a competent person has consented to it.

Any enquiries about the further processing of customer personal information can be made through the bank's contacts via Tel: 0242435050

12 CENTRALISED PROCESSING

The bank aims to create efficiencies in the way it processes information across the bank. Customers' personal information may therefore be processed through centralised functions and systems, which includes the housing of their personal information in a centralised data warehouse.

This centralised processing is structured to ensure efficient processing that benefits both the customer and the bank. Such benefits include, but are not limited to:

- improved information management, integrity and information security.
- the leveraging of centralised crime and fraud prevention tools – this would include the processing of your personal information and special personal information across the bank to prevent, detect and report on financial crimes and related matters in terms of the Anti-Money Laundering Act;
- better knowledge of a customer's financial service needs so that appropriate solutions can be advertised and marketed to the customer.

- a reduction in information management costs.
- analytics, statistics, and research, and
- streamlined transfers of personal information for customers with solutions across different businesses.

Should a customer wish to exercise their privacy rights in terms of personal information provided to the bank or enquire about the centralised processing procedure, enquiries can be made through the contact details of the bank via Tel: 0242435050

13 ENRICHING PERSONAL INFORMATION

The bank aims to provide our customers with solutions that are appropriate and reasonable considering the customer's circumstances (such as financial position, employment status and various obligations) and needs.

The bank may not always have sufficient personal information about the customer to determine the suitability of solutions applied for, to determine which solutions are appropriate to offer proactively to customers or to assist customers with money management tips and advice. In these circumstances, the bank may approach external persons for additional personal information if the law allows.

The bank may (where the law allows) get, use, and share within the group customer personal information (such as what customers purchase and spend their money on; what insurance and investment products customers have and how customers meet their obligations under these products) loll

The purposes for which customer personal information may be used are:

- To determine credit worthiness when applying for credit (which includes the validation of sources of income and income amounts) and to proactively provide suitable credit solutions.
- To manage the credit solutions held with the bank.
- To underwrite long-term or short-term insurance policies when customers apply for it and to proactively provide customers with suitable insurance solutions.
- To prevent, detect and report fraud and other crimes, which includes protecting customers and the bank against fraud and other crimes.
- To offer and provide customers with suitable bank solutions, including credit, insurance, investment, transact and value-added solutions.
- To place customers in the correct customer segment and therefore improve financial and non-financial guidance to customers from the bank.

14 HOW DOES THE BANK USE CUSTOMERS' PERSONAL INFORMATION FOR REWARDS?

The bank may collect and apply personal information about customers from its data base for the assessment of rewards among others such as SWIPE Reward etc.

15 HOW THE BANK USES PERSONAL INFORMATION FOR MARKETING?

- The bank may use prospective customers' or customers' personal information to market financial, insurance, investments and other related banking and other financial solutions to them.
- The bank will do this in person, by post, telephone, or electronic channels such as SMS, email or app notifications.
- If a person is a prospective customer (not a bank customer) or in any other instances where the law requires, the bank will only market to them by electronic communications with their consent.
- **For the purposes of electronic marketing and this paragraph only**, a bank customer would be a person whose contact details were obtained in the context of the sale of the bank's solutions, including:
 - where the person agrees to a solution being provided to them and the bank does not charge for that solution;
 - where the person started to apply or register for a solution but decided to not continue or cancel the transaction;
 - if the bank or the person declined the offer of a solution made to or by the person; and
 - where the person concluded an agreement with the bank regarding the solution offered to the person.
- In all cases, a person can request the bank to stop sending marketing communications to them at any time.
- The person can also withdraw marketing consent or opt-out of marketing at any time. The bank has various interfaces and channels that can be used to withdraw marketing consent or opt-out of marketing, e.g. for example, bank websites or apps.

16 WHEN WILL THE BANK USE CUSTOMERS' PERSONAL INFORMATION TO MAKE AUTOMATED DECISIONS ABOUT THEM?

An automated decision is made when a customer's personal information is analysed without human intervention in that decision-making process.

Customers have the right to query any such decisions made, and the bank will:

- provide the customer with sufficient information about the personal information which was used as well as how and why the bank arrived at the decision; and
- inform the customer of processes available to enable the customer to make representations relating to the automated decision-making and provide the customer a reasonable opportunity to make representations to the bank.

17 WHEN, HOW, AND WITH WHOM DOES THE BANK SHARE CUSTOMERS' PERSONAL INFORMATION?

In general, the bank will only share customers' personal information if any one or more of the following apply:

- if the customer has consented to this.
- if it is necessary to conclude or perform under a contract the bank has with the customer.
- if the law requires it; or

- if it is necessary to protect or pursue the customer's, the bank's or a third party's legitimate interest.

18 WHEN AND HOW THE BANK OBTAINS AND SHARES CUSTOMERS' PERSONAL INFORMATION FROM/WITH CREDIT BUREAUX?

The bank may obtain customers' personal information from credit bureaux for any one or more of the following reasons:

- if the customer requested the bank to do so or agreed that it may do so.
- to verify a customer's identity.
- to obtain or verify a customer's employment details.
- to obtain and verify a customer's marital status.
- to obtain, verify, or update a customer's contact or address details.
- to obtain a credit report about a customer, which includes their credit history and credit score, when the customer applies for an agreement, a debt obligation or a credit agreement to prevent reckless lending or over-indebtedness.
- to determine a customer's credit risk.
- for debt recovery.
- to trace a customer's whereabouts.
- to update a customer's contact details.
- to conduct research, statistical analysis or system testing.
- to determine the source(s) of a customer's income.
- to build credit scorecards which are used to evaluate credit applications.
- to set the limit for the supply of an insurance policy.
- to assess the application for insurance cover.
- to obtain a customer's contact details to enable the distribution of unclaimed benefits under an insurance policy; or
- to determine which solutions to promote or to offer to a customer.

The bank will share a customer's personal information with the credit bureaux for, among others, any one or more of the following reasons:

- to report the application for an agreement, a debt obligation or a credit agreement.
- to report the opening of an agreement, a debt obligation or a credit agreement.
- to report the termination of an agreement, a debt obligation or a credit agreement;
- to report payment behaviour on an agreement, a debt obligation, or a credit agreement; /or
- to report non-compliance with an agreement, a debt obligation, or a credit agreement, such as not paying in full or on time.

Customers should refer to their specific credit agreement with the bank for further information.

Below are the contact details of the credit bureaux that the bank interacts with:

1. DNB Credit Bureau: Email: nunoot@dnbghana.com
2. XDS Data Credit Bureau: Email: ettometry@xdsdata.com

19 UNDER WHAT CIRCUMSTANCES WILL THE BANK TRANSFER CUSTOMERS' PERSONAL INFORMATION TO OTHER COUNTRIES?

The bank will only transfer a customer's personal information to third parties in another country in any one or more of the following circumstances:

- where a customer's personal information will be adequately protected under the other country's laws or an agreement with the third-party recipient.
- where the transfer is necessary to enter, or perform, under a contract with the customer or a contract with a third party that is in the customer's interest.
- where the customer has consented to the transfer; and/or
- where it is not reasonably practical to obtain the customer's consent, but the transfer is in the customer's interest.

This transfer will happen within the requirements and safeguards of applicable laws or privacy rules that bind the bank.

Where possible, the party processing a customer's personal information in another country will agree to apply the same level of protection as available by law in the customer's country, or if the other country's laws provide better protection, the other country's laws would be agreed to and applied.

An example of the bank transferring a customer's personal information to another country would be when a customer makes payments if they purchase goods or services in a foreign country or where personal information is stored with a cloud services provider and the servers are in a foreign country.

TAKE NOTE: As First National Bank Ghana Ltd, a member of the Firststrand Group which operates in several countries, customers' personal information may be shared with group companies in other countries and processed in those countries under the privacy rules that bind the group.

20 CUSTOMERS' DUTIES AND RIGHTS REGARDING THE PERSONAL INFORMATION THE BANK HAS ABOUT THEM

Customers must provide the bank with proof of identity when enforcing the rights below and the bank will then verify the identity of the customer.

Customers must inform the bank when their personal information changes, as soon as possible after the change.

Customers warrant that when they provide the bank with personal information of their spouse, dependants, or any other person, they have permission from them to share their personal information with the bank. The bank will process the personal information of the customer's spouse, dependent or any other person which the customer has shared with it as stated in this notice.

20.1 Right to access

Customers have the right to request access to the personal information the bank has about them by contacting the bank. This includes requesting:

- confirmation that the bank holds the customer's personal information.
- a copy or description of the record containing the customer's personal information; and
- the identity or categories of third parties who have had access to the customer's personal information.

The bank will attend to requests for access to personal information within a reasonable time and in alignment with the law. Customers may be required to pay a reasonable fee (aligned to the law) to receive copies or descriptions of records, or information about, third parties. The bank will inform customers of the fee before attending to their request.

Customers should note that the law may limit their right to access certain information, e.g. information relating to the bank's intellectual property, competitively sensitive information, or legally privileged information.

20.2 Right to correction, deletion or destruction

Customers have the right to request the bank to correct, delete or destroy the personal information it has about them if it is inaccurate, irrelevant, excessive, out of date, incomplete, misleading, obtained unlawfully, or if the bank is no longer authorised to keep it. Customers must inform the bank of their request in the prescribed form. Prescribed form 2 has been included as an annexure to this notice.

The bank will take reasonable steps to determine if the personal information is correct and make any correction needed. It may take a reasonable time for the change to reflect on the bank's platform/systems. The bank may request documents from the customer to verify the change in personal information.

A specific agreement that a customer has entered into with the bank may determine how the customer must change their personal information provided at the time when they entered into the specific agreement. Customers must adhere to these requirements.

If the law requires the bank to keep the personal information, it will not be deleted or destroyed upon the customer's request. The deletion or destruction of certain personal information may lead to the termination of a customer's relationship with the bank.

The bank may not be able to establish a relationship with a customer, continue a relationship with a customer, process a transaction or provide a customer with a solution, if the customer withhold or request deletion of personal information or special personal information required in terms of the Anti-Money Laundering Act for financial crime prevention, detection and reporting purposes.

In certain instances, a customer can give effect to this right by making use of the banks' unassisted interfaces where applicable, e.g. using a bank app or website to correct their contact details.

20.3 Right to objection

Customers may object on reasonable grounds to the processing of their personal information where the processing is in their legitimate interest, the bank's legitimate interest or in the legitimate interest of another party.

Customers must inform the bank of their objection in the prescribed form. Prescribed form 1 is included as an annexure to this notice.

The bank will not be able to give effect to the customer's objection if the processing of their personal information was and is permitted by law, the customer has provided consent to the processing and the bank's processing was conducted in line with their consent; or the processing is necessary to conclude or perform under a contract with the customer.

The bank will also not be able to give effect to a customer's objection if the objection is not based upon reasonable grounds and substantiated with appropriate evidence.

The bank will provide customers with feedback regarding their objections.

20.4 Right to withdraw consent

Where a customer has provided their consent for the processing of their personal information, the customer may withdraw their consent. If they withdraw their consent, the bank will explain the consequences to the customer. If a customer withdraws their consent, the bank may not be able to provide certain solutions to the customer or provide the customer access to the bank's platform. The bank will inform the customer if this is the case. The bank may proceed to process customers' personal information, even if they have withdrawn their consent, if the law permits or requires it. It may take a reasonable time for the change to reflect on the banks' systems. During this time, the bank may still process the customer's personal information.

Customers can give effect to this right by making use of the bank's unassisted service channels, e.g. using a bank app or website, or through an assisted interaction to update their consent preferences.

20.5 Right to complain

Customers have a right to file a complaint with the bank or any regulator in Ghana. The bank will address customer complaints as far as possible.

The contact details of the Information Regulator are provided below.

+233-(0)256301533

+233-(0)256301360

info@dataprotection.org.gh

20.6 Right to Legal Action

Customers have the right to take legal action and request that the Information Regulator take legal action, for certain contraventions of the protection of their personal information.

21 HOW THE BANK SECURES CUSTOMERS' PERSONAL INFORMATION

The bank will take appropriate and reasonable technical and organisational steps to protect customers' personal information in line with industry best practices. The bank's security measures, including physical, technological and procedural safeguards, will be appropriate and reasonable. This includes the following:

- keeping bank systems secure (such as monitoring access and usage);
- storing bank records securely;
- controlling the access to bank premises, systems and/or records; and
- safely destroying or deleting records.

Customers can also protect their own personal information and can obtain more information in this regard by visiting the website or app of the bank.

22 HOW LONG DOES THE BANK KEEP CUSTOMERS' PERSONAL INFORMATION?

The bank will keep customers' personal information for as long as:

- the law requires the bank to keep it;
- a contract between the customer and the bank requires FNBG to keep it;
- the customer has consented to the bank keeping it;
- the bank is required to keep it to achieve the purposes listed in this notice;
- the bank requires it for statistical or research purposes;
- the bank requires it for lawful business purposes.

TAKE NOTE: The bank may keep customers' personal information even if they no longer have a relationship with the bank or if they request the bank to delete or destroy it, if the law permits or requires.

23 COOKIES

A cookie is a small piece of data that is sent (usually in the form of a text file) from a website to the user's device, such as a computer, smartphone or tablet. There are different types of cookies which serve different purposes, and this is fully explained in the bank's cookie notice available on the bank's website. The purpose of a cookie is to provide a reliable mechanism to "remember" user behaviour (keeping track of previous actions), e.g. remembering the contents of an online shopping cart, and actions the user performed whilst browsing when not signed up or logged into their online account.

The bank does not necessarily know the identity of the user of the device but does see the behaviour recorded on the device. Multiple users of the same device would not necessarily be distinguishable from one another.

Cookies could, however, be used to identify the device and, if the device is linked to a specific user, the user would also be identifiable. For example, a device registered to an FNB app

By using bank websites or apps, customers agree that cookies may be forwarded from the relevant website or app to their computer or device. Certain cookies will enable the bank to know that a customer has visited a website or app before and will identify the customer. The bank may also use third-party or necessary cookies to prevent fraud.

Please refer to the [FNBG cookie notice](#) for further information. The bank's cookie notice is available on bank's website.

24 HOW THE BANK PROCESSES PERSONAL INFORMATION ABOUT PERSONS RELATED TO A JURISTIC PERSON

If a customer is a juristic person, such as a company, the bank may collect and use personal information relating to the juristic person's directors, officers, employees, beneficial owners, partners, shareholders, members, authorised signatories, representatives, agents, payers, payees, customers, guarantors, spouses of guarantors, sureties, spouses of sureties, other security providers and other persons related to the juristic person. These are related persons.

If customers provide the personal information of a related person to the bank, they warrant that the related person is aware that they are sharing their personal information with the bank, and that the related person has consented thereto.

The bank will process the personal information of related persons as stated in this notice, thus references to "customer/s" in this notice will include related persons with the necessary amendments and limitations.

