

The PecanTrust Privacy Policy

1. Introduction

This Privacy Policy (“Policy”) and any other document referred to in this Policy sets out the basis on which any personal data that PecanTrust Microfinance Bank. (“My Pecan Bank”, “we” or “us”) collects from you, or that you provide to us will be processed by us. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it. If you have any comments on this Privacy Policy, please email them to info@mypecanbank.com.

2. Consent

You accept this Privacy Policy when you give consent upon access to our website, digital and non-digital platforms, or use our services, content, features, technologies, or functions offered on our website or digital platforms or visit any of our offices for official or non-official purposes. By clicking on the “accept” button or by ticking the “accept” box, you are accepting and consenting to the practices described in this Policy.

Note that you can withdraw your consent at any time. However, such withdrawal of consent would not affect the lawfulness of processing information based on consent given before its withdrawal.

3. Who We Are

Our corporate website address is www.pecantrust.com

4. What We May Collect

We will collect and process the following data about you:

4.1. Information and Content, you provide

We collect the content, communication, and other information you provide when you use our services. These include when you:

- 4.1.1. fill forms, questionnaires or surveys;
- 4.1.2. sign up for an account;
- 4.1.3. provide credit card details;
- 4.1.4. contact us with an enquiry or ask us to provide you with information;
- 4.1.5. register on our website or app or leave any comments or reviews;
- 4.1.6. inform us of your marketing preferences; and/or communicate with us via social media websites, third party apps or similar technologies.

4.2. Information we collect about you.

With regard to each of your visits to our website, office or the use of our products, we may collect the following information:

- 4.2.1. technical information, including the Internet Protocol (IP) address used to connect your computer to the internet, your login information, browser type, time zone setting, browser plug-in types and versions, operating system and platform;
- 4.2.2. information about your use of our website and mobile application (including date and time), details of transactions you carry out, interaction information, the record of any correspondence between us and any phone number used to call our customer service number;
- 4.2.3. information about your visit(s) from your IP address, including the Uniform Resource Locators (URL) clickstream to, through and from our site (including date and time); products or services you viewed or for; page response times, download errors, length of visits to certain pages,

page interaction information (such as scrolling, clicks and mouse-overs), and methods used to browse away from the page.

4.3. Information we receive from other sources.

This is information we receive about you if you use any of the other websites we operate or the other services we provide. In this case, we will inform you at the point of data collection, if we intend to share your data internally and combine it with data collected on www.mypecanbank.com. We will also tell you for what purpose we will share and combine your data. We may work with third from time to time and shall notify you when we receive information about you from them and the purposes for which we intend to use that information.

5. Use of Cookies

Cookies allow a web server to transfer data to a computer or device for recordkeeping and other purposes. We use cookies and other technologies to, among other things, better serve you with more tailored information and facilitate your ongoing access to and use of our website. If you do not want information collected through the use of cookies, there is a simple procedure in most browsers that allow you to decline the use of cookies. To learn more about cookies, please visit <http://www.allaboutcookies.org/>.

6. How We Use Your Personal Information

6.1. We use information held about you in the following ways, that is to:

- 6.1.1. tailor the content we display to you;
- 6.1.2. carry out our obligations arising from any contracts entered between you and us and to provide you with the information, product and services that you request from us;
- 6.1.3. provide you with information about other goods and services we that are similar to those that you have already purchased or enquired about;
- 6.1.4. notify you about changes to our service;st
- 6.1.5. ensure that content from our product is presented in the most manner for you and for your computer;
- 6.1.6. administer our product and for internal operations, troubleshooting, data analysis, testing, research, statistical and survey purposes;
- 6.1.7. improve our product to ensure that content is presented in the effective manner for you and for your device;
- 6.1.8. participate in interactive features of our service, when choose to do so;
- 6.1.9. measure or understand the effectiveness of advertising we serve to and others, and to deliver relevant advertising to you;
- 6.1.10. make suggestions and recommendations to you and other users of product about goods or services that may interest you or them.

6.2. We will use the information provided by you to provide you or permit selected third parties to provide you, with information about goods or services we feel may interest you. If you are an existing customer, we will only contact you electronic means (e-mail or SMS) with information about goods and similar to those, which were the subject of a previous sale or negotiations of a sale to you. If you are a new customer, and where we permit selected third parties use your data, we (or they) will contact you by electronic means only if you have consented to this. If you do not want us to use your data in this way, or to pass your details on to third parties for marketing purposes, you may unsubscribe promotional emails via a link provided in each email.

7. Legal Basis for the processing of personal information

7.1. We will only process your personal information, where we have a legal basis to do so. The legal basis will depend on the purpose for which we have collected use your personal information.

7.2. The legal basis for processing is any of the following:

- 7.2.1. **Consent:** This will apply where you have provided your consent to processing of your personal data for one or more specific purposes;
- 7.2.2. **Performance of a contract with you:** This will apply where processing necessary for the performance of a contract to which you are a party or in order to take steps prior to entering into a contract with you;
- 7.2.3. **Protection of vital interests:** This is where processing is required for protection of your vital interests.
- 7.2.4. **Compliance with law:** Where we are subject to a legal obligation need to use your personal information in order to comply with obligation.
- 7.2.5. **Public interest:** Where processing is necessary for the performance of task or function carried out in the interest of the public.

8. Privacy by Design

When designing and implementing a new business or technological process involving the collection or use of personal data, we will take into consideration, among its other consideration, the need for structured privacy planning for this process. For example, the Bank will consider collecting only the types of information required for the business process in the first place.

9. Security

We adopt robust technologies and policies to ensure the personal information we hold about you is suitably protected. We take steps to protect your information from unauthorized access and against unlawful processing, accidental loss, destruction, and damage. Where you have chosen a password that allows you to access certain parts of the website and mobile application, you are responsible for keeping this password confidential. We advise you not to share your password with anyone. We have also taken measures to comply with global Information Security Management Systems (ISMS) we, therefore, have put in place digital and physical security measures to limit or eliminate possibilities of data privacy breach incidents.

10. Disclosure of your Information

10.1. We will usually not share your personal information with other third without your consent. Where we need to transfer your data to another country, such a country must have an adequate data protection law. Where we need to send your data to a country without an adequate data protection law, we shall that such transfer is subject only to the exceptions contained in Article 2.12 of the Nigeria Data Protection Regulation 2019.

10.2. You agree that we have the right to share your personal information with:

- 10.2.1. any member of our group, which means our subsidiaries, our holding company and its subsidiaries, as defined under the Nigerian Companies and Allied Matters Act Cap C20 Laws of the Federation of Nigeria 2004.
- 10.2.2. authorized employees of PecanTrust Microfinance Bank. only for the purpose of issues associated with the use of our services.
- 10.2.3. selected third parties, including:
 - 10.2.3.1. business partners, suppliers or sub-contractors for performance of any contract we enter into with them;

- 10.2.3.2. advertisers and advertising networks that require the to select and serve relevant adverts to you and others. We do not disclose information about identifiable individuals to our advertisers, but we will provide them with aggregate information about our users (for example, we may inform them that 500 men aged under 30 have clicked on their advertisement on any given day). We may also use such aggregate information to help advertisers reach the kind of audience they want to target;
 - 10.2.3.3. analytics and search engine providers that assist us in the improvement and optimization of our corporate and products website.
- 10.3. We may share your data without your consent in any of the following situations:
 - 10.3.1. if we are under a duty to disclose or share your personal data in order comply with any legal obligation, or in order to enforce or apply our terms of use and other agreements; or to protect the rights, property, or safety of PecanTrust Microfinance Bank, our clients, or others;
 - 10.3.2. where we are requested to provide information by authorized third or regulatory/governmental agencies investigating illegal activities;
 - 10.3.3. in the event that we sell or buy any business or assets, in which case will disclose your personal data to the prospective seller or buyer of such business or assets.
 - 10.3.4. if PecanTrust Microfinance Bank, or substantially all of its assets are acquired by a party, in which case, personal data held by it about its clients will be one of the transferred assets.
 - 10.3.5. We may hold events including seminars and conferences which are sponsored by third parties or have third-party speakers. Where you register for one of these events, we may share your details with those third parties.
 - 10.3.6. We use third-party payment processing services when you make through our web or mobile app. We do not have access to any credit card or financial information processed by the third party.

11. Where we store your Data

- 11.1. The data that we collect from you will be transferred to and stored at destinations within Nigeria. By submitting your personal data, you agree to this transfer, storing or processing. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Policy.
- 11.2. All information you provide to us is stored on our secure servers. Any transactions will be encrypted using Secure Sockets Layer (SSL) technology. Where we have given you (or where you have chosen) a password, which enables you to access the services on our website and mobile applications, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

12. Retention of Information

- 12.1. Your personal information will not be retained for longer than is necessary for purposes for which it was processed.
- 12.2. In line with CBN guidelines, we don't keep your personal information for more than 10 years.

13. Your Rights

- 13.1. The law gives you certain rights in respect of the information we hold about you. Below is a highlight of some of those rights. It is not a complete, exhaustive processed by statement of your rights in respect of your personal data.
 - 13.1.1. You have a right to consent to this Privacy Policy and to withdraw consent at any time.
 - 13.1.2. You have a right to a copy of the personal data we hold about you, as the information about what we do with it, who we share it with and how long we hold it for. We may make a reasonable charge for additional copies of that data in the case of unfounded and excessive requests.
 - 13.1.3. You have a right to freely transfer your data received from us to any person.
 - 13.1.4. You have the right to have the information we hold about you if it is factually inaccurate. You may contact us for this purpose.
 - 13.1.5. In some circumstances, you have the right to delete information that we hold about you.
 - 13.1.6. You have a right to lodge a complaint about the handling of your information with the National Information Technology Development Agency (NITDA).
 - 13.1.7. You have the right to ask us not to process your personal data for marketing purposes. We will usually inform you (before collecting your data) if we intend to use your data for such purposes or if we intend to disclose your information to any third party for such purposes.
- 13.2. NITDA's website (<https://nitda.gov.ng/nit/>) has a wealth of useful information respect of your rights over your personal data.
- 13.3. If you wish to exercise your rights, you may contact the office of our protection officer at infosec@mypecanbank.com.
- 13.4. Where we do not act on your request to exercise any of your rights, we inform you within one month of receipt of your request of the reasons for not taking action and on the possibility of lodging a complaint with NITDA.

14. Changes to our Privacy Policy

- 14.1. Any changes we make to this Policy in the future will be posted on this page where appropriate, notified to you by e-mail. Please check back frequently to see any updates or changes to this Policy.
- 14.2. Please note that our products may, from time to time, contain links to and from the websites of our partners, advertisers, and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

15. Contact

Questions, comments, and requests regarding this privacy policy are welcomed and should be addressed to info@mypecanbank.com or our office: No. 32, Grace Anjous Drive, Lekki Phase 1, Lagos State