

FidBank UK Privacy Notice

This Privacy Notice describes how we collect, use, process, and disclose your information, including personal information, in conjunction with your Banking Services with FidBank UK.

1.1 Who are we?

FidBank UK ("FBUK"), is a UK incorporated Bank and is a wholly owned subsidiary of the Fidelity Bank of Nigeria Plc, one of the oldest and most respected banks in West Africa. We provide a comprehensive range of banking services to customers, including personal banking, and business banking, such as trade finance, treasury services, and commercial lending.

Personal data refers to any information relating to an identified or identifiable natural person

Our Data Protection Officer can be contacted directly here:

- dpo@fidbank.uk
- (+44) 020 7920 6100

The personal data we would like to collect from you may include:

Type of personal information	Description
Financial	Your financial position, status, and history.
Contact	Where you live and how to contact you.
Socio-Demographic	This includes details about your work or profession, nationality, and education.
Transactional	Details about payments to and from your accounts with us.
Contractual	Details about the products or services we provide to you.
Locational	Data we get about where you are, such as may come from your mobile phone, the address where you connect a computer to the internet, or a shop where you buy something with your debit card.
Behavioural	Details about how you use our products and services.
Technical	Details on the devices and technology you use.
Communications	What we learn about you from letters, emails, and conversations between us.
Social Relationships	Your family and other relationships.
Open Data and Public Records	Details about you that are in public records, such as the Electoral Register, and information about you that are openly available on the internet.
Usage Data	Other data about how you use our products and services.

Type of personal information	Description
Documentary Data	Details about you that is stored in documents in different formats, or copies of them. This could include things like your passport, drivers licence or utility bills.
Special types of data	<p>The law and other regulations treat some types of personal information as Special types of data. We will only collect and use these types of data if the law allows us to do so.</p> <ul style="list-style-type: none"> • Racial or ethnic origin • Religious or philosophical beliefs • Trade union membership • Genetic and bio-metric data • Health data including gender • Criminal convictions and offences
Consents	Any permissions, consents or preferences that you give us. This includes how you want us to contact you, or whether you get paper statements.

In addition, we may collect your personal information from:

We may collect personal information about you (or your business) from our parent bank, Fidelity Bank of Nigeria plc, and these sources:

Data you give to us:

- When you apply for our products and services
- When you talk to us on the phone
- When you use our websites, mobile device apps,
- In emails and letters
- In financial reviews and interviews
- When you visit our offices or attend our events
- In customer surveys and feedback forms

Data we collect when you use our services. This includes the amount, frequency, type, location, origin and recipients:

- Payment and transaction data.
- Profile and usage data. This includes data about how you use your services with us. We gather this data from devices you use to connect to those services, such as computers and mobile phones, using cookies and other internet tracking software.

Data from third parties we work with:

- Companies that introduce you to us
- Credit reference agencies
- Retailers
- Fraud prevention agencies
- Real Estate agents, Solicitors and your other Professional advisers

- Public information sources such as Companies House, and Corporate Registries
- Agents working on our behalf.
- Due diligence repositories such as licensed central databases
- Government and law enforcement agencies.

How we use the personal data we collect from you, our reasons for collecting the data and our legal basis for collecting the data are as follows:

<u>What we use your personal information for</u>	<u>Legal Basis</u>	<u>Reasons</u>
<ul style="list-style-type: none"> • To manage our relationship with you or your business. • To develop and carry out marketing activities 	<ul style="list-style-type: none"> • To fulfil our contract • Your consent 	<ul style="list-style-type: none"> • Keeping our records up to date, provision of banking services, working out which of our products and services may be of interest to you. • Defining types of customers for new products or services, services that may be of interest to you and telling you about them.
<u>What we use your personal information for based on our Legitimate Interests</u>	<u>Reasons (any of the following)</u>	

<ul style="list-style-type: none"> • To develop new ways to meet our customers' needs and to grow our business. • To test and identify new products. • To provide advice or guidance about our products and services • To study how our customers use products and services from us and other organisations. • To develop and manage our brands, products and services. • To manage how we work with other companies that provide services to us and our customers: • To deliver our products and services. • To make and manage customer payments. • To manage fees, charges and interest due on customer accounts. • To collect and recover money that is owed to us. • To manage and provide treasury and investment products and services. • To detect, investigate, report, and seek to prevent financial crime. • To manage risk for us and our customers. • To obey laws and regulations that applies to us. • To respond to complaints and seek to resolve them. • To run our business in an efficient and proper way. This includes managing our financial position, business capability, planning, communications, corporate governance, and audit. • To exercise our rights as set out in agreements or contracts 	<ul style="list-style-type: none"> • For managing accounts and our banking relationships. • For research, analysis, developing products and services, and what we charge for them. • Defining types of customers for new products or services. • To fulfil our legal and contractual duties. • To comply with regulations that applies to us. • For developing and improving how we deal with financial crime, as well as doing our legal duties in this respect. • For preventing or tackling fraud or any other illegal activity.
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1.2 Disclosure - Who we share your personal information with

We may share your personal information with Fidelity Bank of Nigeria, in which case we will make sure that they agree to apply the same level of protection as we are required

to apply to your information, and to use your information strictly in accordance with our instructions. We may also share your information with these organisations:

- Agents and advisers who we use to help run your accounts and services, collect what you owe, and explore new ways of doing business
- HM Revenue & Customs, regulators, and other authorities
- UK Financial Services Compensation Scheme
- Credit reference agencies
- Fraud prevention agencies
- Companies we have a joint venture or agreement to co-operate with
- Organisations that introduce you to us
- Companies that we introduce you to
- Companies that provide us with essential services for our business
- Companies you ask us to share your data with

We may need to share your personal information with other organisations to provide you with the product or service you have chosen:

- If you have a debit, or charge card with us, we will share transaction details with companies which help us to provide this service, such as MasterCard.
- If you use direct debits, we will share your data with the UK Direct Debit scheme.
- If you have a secured loan or mortgage with us, we may share information with other lenders who also hold a charge on the property.

We may also share your personal information if the make-up of the Fidelity Bank Group changes in the future:

- We may choose to sell, transfer, or merge parts of our business, or our assets. Or we may seek to acquire other businesses or merge with them.
- During any such process, we may share your data with other parties. We'll only do this if they agree to keep your data safe and private.
- If the change to our Group happens, then other parties may use your data in the same way as set out in this notice.

FidBank UK will not pass on your personal data to other third parties without first obtaining your consent.

Sending data outside of the EEA

We will only send your data outside of the European Economic Area ('EEA') to:

- Follow your instructions.
- Comply with a legal duty.
- Work with our agents, advisers, and other third parties who we use to help run your accounts and services.
- Fidelity Bank of Nigeria

If we do transfer information to Fidelity Bank of Nigeria, our agents, advisers, or other third parties outside of the EEA, we will make sure that it is protected in the same way as if it was being used in the EEA. We will use one of these safeguards:

- Transfer it to a non-EEA country with privacy laws that give the same protection as the EEA.
- Put in place a contract with the recipient that means they must protect it to the same standards as the EEA.
- Transfer it to organisations that are part of Privacy Shield. This is a framework that sets privacy standards for data sent between the US and EU countries. It makes sure those standards are similar to what is used within the EEA.

You can find out more about data protection on the European Commission Justice website here:

[Data protection in the EU \(europa.eu\)](https://european-council.europa.eu/media/e300197/speeches/146776/attachment/146776.pdf)

How long we keep your personal information

Where we process personal data in connection with performing an agreement we have with you or our customer, we keep your personal data for as long as is required in order to fulfil our contractual obligations to you or our customers and for a prudential term thereafter, to maintain records in accordance with the law, rules and regulations. After you stop being a customer, we may therefore keep your data for up to 6 years. We may keep your data for longer than 6 years if we cannot delete it for legal or regulatory reasons. If we do, we will make sure that your privacy is protected and only use it for those purposes.

Where we process personal data in connection with a legal obligation (for example for Anti-Money Laundering purposes) such personal data will be kept for as long as is required under applicable law.

Where we process personal data solely with your consent, we process the personal data until you ask us to stop, and for a reasonable period for completion of any pending transactions upon your request.

1.3 Your rights as a data subject

At any point while we are in possession of or processing your personal data, you, the data subject, have the following rights:

- Right to be informed – you have the right to be provided with details of the way in which we collect and use your personal data.
- Right of access – you have the right to request a copy of the information that we hold about you.
- Right of rectification – you have a right to correct data that we hold about you that is inaccurate or incomplete.
- Right to be forgotten – in certain circumstances you can ask for the data we hold about you to be erased from our records.
- Right to restriction of processing – where certain conditions apply to have a right to restrict the processing.
- Right of portability – you have the right to have the data we hold about you transferred to another organisation.
- Right to object – you have the right to object to certain types of processing such as direct marketing.
- Right to object to automated processing, including profiling – you also have the right to be subject to the legal effects of automated processing or profiling.
- Right to judicial review: in the event that Organisation Name refuses your request under rights of access, we will provide you with a reason as to why. You have the right to complain as outlined in clause 1.5 below.

Any requests we receive from you, in relation to any of the above, will be forwarded on to any third party involved in the processing of your personal data collected through us.

How to get a copy of your personal information

You can access your personal information we hold by filling in this form or by writing to us at this address:

FidBank UK
1 Kings Arms Yard
London
EC2R 7AF

Email: DPO@fidbank.uk

Letting us know if your personal information is incorrect

You have the right to question any information we have about you that you think is wrong or incomplete. Please contact us if you want to do this. If you do, we will take reasonable steps to check its accuracy and correct it.

What if you want us to stop using your personal information?

You have the right to object to our use of your personal information, or to ask us to delete, remove, or stop using your personal information if there is no need for us to keep it. This is known as the 'right to object' and 'right to erasure', or the 'right to be forgotten'.

There may be legal or other official reasons why we need to keep or use your data, but please tell us if you think that we should not be using it.

We may sometimes be able to restrict the use of your data. This means that it can only be used for certain things, such as legal claims or to exercise legal rights. In this situation, we would not use or share your information in other ways while it is restricted.

You can ask us to restrict the use of your personal information if:

- It is not accurate.
- It has been used unlawfully but you don't want us to delete it.
- It is not relevant anymore, but you want us to keep it for use in legal claims.
- You have already asked us to stop using your data but you are waiting for us to tell you if we are allowed to keep on using it.

If you want to object to how we use your data or ask us to delete it or restrict how we use it, please contact us.

1.4 Marketing

We may use your personal information to tell you about relevant products and offers. This is what we mean when we talk about 'marketing'.

The personal information we have for you is made up of what you tell us, and data we collect when you use our services, or from third parties we work with.

We study this to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you.

We can only use your personal information to send you marketing messages if we have either your consent or a 'legitimate interest'. That is when we have a business or commercial reason to use your information. It must not unfairly go against what is right and best for you.

You can manage your marketing preferences and opt out at any time by calling our customer services team on: **020 7920 6100** Whatever you choose, you'll still receive statements, and other important information such as changes to your existing products and services.

We may ask you to confirm or update your choices, if you take out any new products or services with us in future. We will also ask you to do this if there are changes in the law, regulation, or the structure of our business.

If you change your mind you can update your choices at any time by contacting us.

1.5 Complaints

In the event that you wish to make a complaint about how your personal data is being processed by FidBank UK or a third party, or how your complaint has been handled, you have the right to lodge a complaint directly with the FidBank UK Data Protection Officer email, and if you remain dissatisfied, with the Information Commissioner's Office – click here for details:

[Make a complaint | ICO](#)

You may make a complaint regarding how your personal data has been processed, how your request for access to your data has been handled, and other matters, including how your complaint has been handled, and make an appeal against any decision made following a complaint. If we refuse to act within the appropriate timescale on a data subject's access request, or refuses the request, we will tell you the reasons we took no action or for the refusal. We will also inform you, as the data subject(s) of your right to complain directly to the supervisory authority and provide you with the contact details of the supervisory authority where you are free to seek judicial remedy.

1.6 Subject Access Request

You may request for details of the personal data that is held on you by FidBank UK. You may specify the nature of the data to which your enquiry refers. You will need to provide us with copies of your ID in the form of certified copies of Passport, or a Photocard Driving Licence, and Utility Bill dated within the past three months, to enable us to comply with your request. A Subject Access Request form is available for your use [here](#).

1.7 Consent

By consenting to this privacy notice you are giving us permission to process your personal data specifically for the purposes identified. Consent is required for FidBank UK plc to process certain personal data, but it must be explicitly given. Where we are asking you for sensitive personal data we will always tell you why and how the information will be used. We encourage our customers to regularly review this Privacy Notice to stay informed about how we handle their personal data.

You may withdraw consent at any time by informing us that we no longer have your consent to process your personal data for the purpose/s for which it was granted. You may do this by submitting a Data Subject Consent Withdrawal form which you will find [here](#).

If you choose not to give your consent

We may need to collect personal information by law, or under the terms of a contract we have with you.

If you choose not to give us this personal information, it may delay or prevent us from meeting our obligations. It may also mean that we cannot perform services needed to run your accounts. It could mean that we cancel a product or service you have with us.

Any data collection that is optional would be made clear at the point of collection.

1.8 Changes to this Privacy Statement

If we modify this Privacy Statement at any time, we will place the modified versions on our website. We encourage you to regularly review this Privacy Statement to ensure that you are always aware of what personal information we collect and how we use, store and disclose your data.