



DATA PRIVACY NOTICE

LEVERAGE-MFB recognizes the importance of privacy and security of our customers' personal information. We value the trust you place in us to protect your personal information and respect your right to privacy. While new technologies have dramatically changed the way information is gathered, used, and stored, preserving customer trust and the privacy of personal information at LEVERAGE-MFB remains a core objective. We believe it is important to make clear to our customers how information is being collected, used, and shared at LEVERAGE-MFB, the benefits such use provides, and the protections put in place against unauthorized access and use. We respect your privacy and the confidentiality of your personal information, and we appreciate the opportunity to do business with you.

1 . Our Privacy Principles

We will only collect, transfer, process and store your personal information with your express permission unless legally required to do so and will only use such information for the lawful purpose for which it is required. We will disclose the specific purpose for which we use, request, and store your personal information. We will also keep a record of that personal information and the specific purpose for which we collect it. We will not use your personal information for any other purpose, other than that which we disclosed to you, unless you give us your express consent to do so, or unless we are permitted to do so by law.

2. Information We Collect

The personal data we would like to collect from/process on you is:

Personal Data Type	Sources
Name such as full name, maiden name, etc.	Account opening forms, Registers, etc.
Date of Birth, Place of birth, Racial or Ethnic origin, Employment information, etc.	Account opening forms, Employment forms, etc.
Address (Email/Home/Office)	Account opening forms, Employment forms, etc.
Bank Details/Bank Verification Number, Passport number, Tax number, Debit/credit card number, etc.	Loans, LPO and Advances obligation
Medical Information/History	Employment forms, HMOs, etc.
Asset information such as IP Address, MAC address, etc.	Intranet tracking activity, Domain login information records, etc.
Personal characteristics such as Biometric Records, Fingerprints, Handwriting, Photographic image, etc.	CCTV coverage, passport photographs, etc.

The personal data we collect will be used for providing essential banking services to clients and customers, as well as for marketing purposes and fulfilment of our contract obligations, etc.

LEVERAGE MICRO FINANCE BANK is bounded by the following legal basis for processing the personal data we collect:

- Legal/regulatory obligation
- Data subjects' consent
- Performance of contract obligations

Any legitimate interests pursued by us, or third party we use, are as follows

- Vital interest
- Public interest

The special categories of personal data concerned are:

- Names
- Addresses
- Identification number • Email address, etc.

3. Consent

LEVERAGE-MFB requires your explicit consent to process collected personal data. By consenting to this privacy policy, you are giving us the permission to use/process your personal data specifically for the purpose identified before collection.

If, for any reason, LEVERAGE-MFB is requesting sensitive personal data from you, you will be rightly notified why and how the information will be used. You may withdraw consent at any time by requesting for Withdrawal of Consent form, following the LEVERAGE-MFB Withdrawal of Consent Procedure.

3.1 Disclosure

LEVERAGE-MFB will not pass on your personal data to third parties without first obtaining your consent.

3.2 Consent

At any point while LEVERAGE-MFB is in possession of or processing your personal data, you, the data subject, have the right to:

- Request a copy of the information that we hold about you.
- Correct the data that we hold about you that is inaccurate or incomplete.
- Ask for the data we hold about you to be erased from our systems/record.
- Restrict processing of your personal data where certain conditions apply.
- Have the data we hold about you transferred to another organization.
- Object to certain types of processing like direct marketing.
- Object to automated processing like profiling, as well as the right to be subject to the legal effects of automated processing or profiling.
- Judicial review, if LEVERAGE-MFB refuses your request under rights of access, we will provide you with a reason as to why. And you have the right to complain as outlined in clause below.

All the above requests will be forwarded, should there be a third party involved in the processing of your personal data.

3.3 Complaints

If for any reason you wish to make a complaint about how LEVERAGE-MFB (or any of our third parties described in 3.1 above) processes your personal data, or how your complaint has been handled, you have the right to lodge a complaint directly with the Data Protection Officer of LEVERAGE-MFB.

When you wish to file a data privacy complaint, you are required to send a request to hello@leveragemicrofinancebank.com LEVERAGE-MFB shall contact you within fourteen days to validate the request for processing.

4. Online Privacy Statement

How We Use Your Information

This privacy notice tells you how we, LEVERAGE MICRO FINANCE BANK LIMITED, will collect and use your personal data for relationship management, profiling, business analytics/development, communication, registration, subscription, cookies, and all-round efficient service delivery.

Information We Collect On Our Various Channels

We may collect some personal information from you directly. We may collect information from you when you register on our various platforms which includes Internet banking portal, Mobile App, Personal banking channels, WhatsApp/Facebook.

- We may collect information from you when you register on our Internet Banking portal.

We may collect, amongst others, your name, e-mail address, phone number, date of birth, nationality, gender, residential address, identity (ID) number, copy of your ID and a photograph, biometric data, device ID, device location, and details of your Debit/Credit/Prepaid Card. We collect information about you based on your use of our products, services, or service channels (like our websites, applications, ATMs).

Debit/Credit/Prepaid Card information such as the Card PAN, Expiry Date, Card Currency, Name on Card, and Card Billing Address.

In certain circumstances, we collect information about you whereas you do not have a direct relationship with us, for example if you are a beneficiary of transfer of funds made by our customer.

- We may collect information from you when you register on our mobile app.

We may collect your name, e-mail address, phone number, date of birth, gender, residential address, ID number, device ID, and device location when onboarding on our Loan platform.

For debit card onboarding, we may collect debit card number and PIN from you and collect other personal information from our core banking system as part of your profile creation in the mobile app. For internet banking onboarding, we collect username and collect other personal information from our core banking system as part of the profile creation.

We may collect, amongst others, your name, e-mail address, phone number, date of birth, nationality, gender, residential address, identity (ID) number, copy of your ID and a photograph, biometric data, device ID, device location, and details of your Debit/Credit/Prepaid Card. We collect information about you based on your use of our products, services, or service channels (like our websites, applications, ATMs).

- We may collect information from you when you register on our chatbot.

We may collect your name, e-mail address, phone number, date of birth, gender, residential address, ID number, device ID, and device location.

We may collect information identifiers and information such as IP address, browser version, operating system, and software data. When we collect information about you from your profile on Facebook, the privacy notice between you and Facebook shall apply.

FAQ

Why Does LEVERAGE-MFB Need to Collect and Store Personal Data?

We need to collect your personal data in order for us to provide you with our services as mentioned in clause 3.1 above. In any event, we are committed to ensuring that the information we collect, and use is appropriate for this purpose(s) only and will in no way invade your privacy. If there is a need to use your personal data for marketing purpose, LEVERAGE-MFB will ensure to seek additional consent from you.

Will LEVERAGE-MFB Share My Personal Data with Anyone Else?

LEVERAGE-MFB only shares personal information with other companies or individuals in the following limited circumstances:

We have your consent. We require consent for the sharing of any sensitive personal information.

LEVERAGE-MFB may pass your personal data to third-party service providers contracted by us. Any third party that we may share your personal data with is under an obligation to secure your details and use them only to fulfil the service for which they were contracted. When they no longer need your details to fulfil this service, the data will be disposed in line with the LEVERAGE-MFB procedures.

If we wish to pass your sensitive personal data onto a third party we will only do so once we have obtained your consent, unless we are required to do otherwise, legally.

We have a good faith belief that access, use, preservation or disclosure of such information is reasonably necessary to (a) satisfy any applicable law, regulation, legal process or enforceable governmental request, (b) enforce applicable Terms of Service, including investigation of potential violations thereof, (c) detect, prevent, or otherwise address fraud, security or technical issues, or (d) protect against imminent harm to the rights, property or safety of LEVERAGE-MFB, its users or the public as required or permitted by law.

Information collected will be used for:

- Services

We use your data we have collected to authenticate you and authorize access to our services on the channels. These services include, amongst others, money transfer services, KYC validation, and exchange rates conversion.

- Communication

We will contact you through email, short message services (SMS), phone call, and other ways through our services, including text messages and push notifications. We will send you messages about the availability of our services, security, or other service-related issues. We also send messages about how to use the services and network updates.

- Advertising and Marketing

We serve you tailored advertisements through our apps, other channels, and media of our services. We target advertisements in our Apps and through other channels and media to customers of our services through a variety of ad networks and exchanges, using data from advertising technologies and information from advertising partners, publishers, and data aggregators.

We use data and content about our customers for invitations, promotions, and communications solely for promoting our services.

- Customer Support

We use the data needed to investigate, respond to, and resolve complaints and service issues.

- Security, Fraud, and Investigations

We use your data for security purposes or to investigate possible fraud or other violations of our User Agreement or this Privacy Policy and/or attempts to harm our customers and/or visitors.

How do we secure your information?

Ensuring the security of our systems and safeguarding our users' information is of utmost importance to LEVERAGE-MFB. It is fundamental to upholding the integrity of our brand and providing our customers with a secure and trustworthy experience across all our platforms,

including our websites, apps, advertising services, products, and technologies. Our commitment to protecting user data is integral to maintaining the trust our customers place in us:

- LEVERAGE-MFB has technical, administrative, and physical safeguards in place to help protect against unauthorized access, use or disclosure of customer information we collect or store.
- We implement a variety of security measures to maintain the safety of your personal information when you enter, submit, or access your personal information.
- We offer the use of a secure transmission, processing and storage services using standardized security safeguards.
- All supplied sensitive/credit information are encrypted via transaction layer security (TLS) technology during transmission to avoid misuse of your data. Card Number (PAN), CVV and expiry date of any debit, credit and prepaid cards attached to our apps are tokenized and stored on our backend systems at our data processor.
- Your personal information may be accessible by those authorized with special access rights to such systems and are required to keep the information confidential. Information such as PINs and passwords are not accessible to our authorized personnel.

Under what circumstances will LEVERAGE-MFB Contact Me?

We do not intend to be intrusive, and we will not ask irrelevant or unnecessary questions. Moreover, we will subject the information you provide to rigorous measures and procedures to minimize the risk of unauthorized access or disclosure.

Can I Find Out the Personal Data That LEVERAGE-MFB Holds About Me

LEVERAGE-MFB, at your request, can confirm what information we hold about you and how it is processed. If we do hold your personal data, you have the right to request the following information:

- Contact details of the data protection officer, where applicable.
- The purpose of the processing as well as the legal basis for processing.

- Information about interests, if the processing is based on the legitimate interests of LEVERAGE-MFB or a third party.
- The categories of personal data collected, stored, and processed.
- Recipient(s) or categories of recipients that the data is/will be disclosed to.
- Information about how we intend to securely transfer the personal data to a third party or international organization. The Attorney General of the Federation will approve sending personal data to some countries because they meet a minimum standard of data protection. In other cases, we will ensure there are specific measures in place to secure your information.
- How long the data will be stored.
- Details of your rights to correct, erase, restrict or object to such processing.
- Information about your right to withdraw consent at any time.
- How to lodge a complaint with the supervisory authority (NDPC).
- Whether the provision of personal data is a statutory or contractual requirement, or a requirement necessary to enter into a contract, as well as whether you are obliged to provide the personal data and the possible consequences of failing to provide such data.
- The source of personal data if you didn't provide it directly.
- Any details and information of automated decision making, such as profiling, and any meaningful information about the logic involved, as well as the significance and expected consequences of such processing.

How long will LEVERAGE-MFB Store My Personal Data?

We keep most of your personal data for as long as your account is active. We retain the personal data you provide while your account is in existence or as needed to provide you with our services.

What Forms of ID Will I Need to Provide in Order to Access This?

LEVERAGE-MFB accepts the following (but not limited to) forms of ID when information on your personal data is requested: International Passport, Driving License, National Identity Card, and Permanent Voter's Card.

5. Account Closure

We retain your personal data even after you have closed your account if reasonably necessary to comply with our legal obligations (including law enforcement requests), meet regulatory requirements, resolve disputes, maintain security, and prevent fraud.

6. Protecting Children's Privacy

Our services are for a general audience. We do not knowingly collect, use, or share information that could reasonably be used to identify children without prior parental consent consistent with applicable law.

7. Changes to our Privacy Policies

We may update this Privacy Notice to reflect changes to our information practices, if we make any material changes, we will notify you by an email (sent to the email address specified in your account) or by means of a notice on this website or via a link from your mobile application prior to the change becoming effective. We encourage you to periodically review this page for updates on our privacy practices.

8. Contact us

If there are any questions regarding this Privacy Notice, any further information you would need, or a data breach incident you would like to report on, please contact us using the information provided below.

Data Protection Manager

LEVERAGE MICRO FINANCE BANK LIMITED.

5, Khalil Road, Opposite FirstBank, Warri Main Market,

Warri – Delta State,

Nigeria.