

1. INTRODUCTION

Bank of Industry ("us", "we", or "our") understands the criticality of privacy in handling your ("Data subject") personal data. Hence, we want you to engage with us knowing that we value your Personal Data and that we protect it.

We have prepared this privacy policy in line with the Nigeria Data protection Regulation (NDPR) principles statutorily mandated by the NITDA ACT of 2007. This regulation governs the way in which we collect, use, disclose, store, secure and dispose of your Personal Data.

Here you will find details of how we process your Personal Data, the purposes for which we process it, your rights regarding the data we process and how you can contact us.

2. PERSONAL DATA COLLECTED

Personal information refers to data that could identify a specific individual such as names, addresses, e-mail addresses, and telephone numbers. As you interact with our website (www.boi.ng), we collect various types of information from you, as described below:

- Contact Information- This includes any information you provide to Bank of Industry that would allow us to identify and contact you personally, such as your name, residential address, e-mail address, phone number, and photo.
- Device Information- BOI automatically receives and records information from your browser or your mobile device when you visit the site, such as your IP address or unique device identifier, cookies, and data about which pages you visit and how you interact with those pages in order to allow us to operate and provide better services.
- Location Information- We collect location information provided by your device. We use such information for advertising, analytics and improving the quality of our service offerings.

3. CONDITION FOR PROCESSING PERSONAL DATA:

Bank of Industry Personnel or any third party acting on its behalf shall only process your personal data if at least one of these conditions are met:

- Consent: this refers to any freely given, specific, informed and unambiguous indication through a statement or a clear affirmative action that signifies your agreement to the processing of your Personal Data by Bank of Industry. Bank of Industry shall not seek consent that may engender direct or indirect propagation of atrocities, hate, criminal acts and anti-social conducts.
- Contract: processing is necessary for the performance of a contract or entering into a contract at your request.
- Legal obligation: processing is necessary for compliance with a legal obligation to which Bank of Industry is subject.
- Vital interest: processing is necessary to protect your vital interests or those of another natural person.
- Public interest: processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in Bank of Industry.

4. HOW WE USE YOUR PERSONAL DATA

To the extent permissible under applicable law, we may use your information for the following legitimate actions:

- Provide lending services as you have requested and as part of our contractual obligations towards you.
- To enable you interact with social networks you are signed into while using the service, such as sharing content with the social network and other features you employ with the social network, or that are allowed in the social network's privacy policy.
- Certain cookie technologies are employed to make the site function for its intended purpose.
- BOI partners with third-party service providers (e.g. Google) that may use various Cookie Technologies to permit us and them to learn about your preferences when you visit our site.

5. USER RIGHTS

You have rights when it comes to our handling of your Personal Data. Those rights include:

- The right to request for access to your Personal Data where those requests are reasonable and permitted by law or regulation. Bank of Industry shall provide reasonable and accessible means for you to submit your requests, which do not have to take any specific form and can be submitted by any method.
- the right to request that Bank of Industry erase your Personal Data if it is no longer valid or necessary for the purposes for which it was collected or if it is incomplete.
- The right to rectify or amend inaccurate or incomplete Personal Data.
- The right to withdraw your Consent at any time. This can be initiated by contacting the Data Protection Office of Bank of Industry.
- The right to object to Bank of Industry processing of your Personal Data if there are compelling legitimate grounds to do so and to the extent permitted by law or regulation. For example, you have the right to object to Bank of Industry's processing of your Personal Data for direct marketing purposes.
- The right to receive your Personal Data in a commonly used and machine-readable format and the right to transmit these data to another Data Controller when the processing is based on (explicit) consent or when the processing is necessary for the performance of a contract.
- The right to lodge a complaint with the National IT Development Agency (NITDA) where you believe our processing of your data violates the requirements of the Nigeria Data Protection Regulation 2019 (NDPR).

6. DATA COLLECTION METHODS

- Web Forms: We keep record of your personal details provided via our web portal. Typically, such details are processed for the provision of loan facilities and are kept in a secure manner.
- Cookies: We keep record of your personal details obtained from interactions with our website via cookies.
- Chat-box: We keep record of your personal details provided via our chat-box. These details are processed to address your complaints and enquiries.

7. COOKIES

We host the following categories of cookies:

- **Necessary:** Necessary cookies help make a website usable by enabling basic functions like page navigation and access to secure areas of the website. The website cannot function properly without these cookies.
- **Preference:** Preference cookies enable a website to remember information that changes the way the website behaves or looks, like your preferred language, the region that you are in. These cookies may be used to remember your preferences with the chat-box functionality.
- **Statistics:** Statistic cookies help us to understand how visitors interact with websites by collecting and reporting information anonymously.
- **Marketing:** Marketing cookies are used to track visitors across websites. The intention is to display ads that are relevant and engaging for the individual user and thereby more valuable for publishers and third-party advertisers.

8. TRANSFER OF PERSONAL DATA

Personal data collected by Bank of Industry may be transferred among its various divisions (with personnel who have business need to know). The following describes the various scenarios for which we may share your Personal Data to a third party:

- **Transfer as a legal requirement:** We may share your information with other parties when required by law or as necessary to protect our service.
- **Out of Country Transfer:** Your Personal Data is stored in Europe and USA in line with the permissible conditions defined by the GDPR. We will ensure that appropriate safeguards are in place to ensure the protection of your Personal Data being stored out of the country.

9. HOW WE ENSURE PROTECTION OF YOUR PERSONAL DATA

We have implemented appropriate organizational and technical measures (including physical access controls and secure software and operating environments) to keep your Personal Data confidential and secure. Please note, however, that these protections do not apply to information you choose to share in public areas such as third-party social networks.

Data Retention Policy: We ensure that your personal data are not retained for longer than 10 years after relationship ends, subject to any requirements to retain information in order to comply with any applicable law, regulation, professional requirements or standards.

Personal Data Breach Notification: Bank of Industry will inform relevant authorities and if necessary affected individuals of personal data breach within 72 hours of being aware of the breach, where Personal Breach refers to a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to, personal data. This includes breaches that are the result of both accidental and deliberate causes.

10. POLICY UPDATES

If we change the way we handle your Personal Data, we will update this Notice. We reserve the right to make changes to our practices and this Notice at any time, please check back frequently to see any updates or changes to our Notice.

11. PRIVACY POLICY COMPLAINTS AND ENQUIRES

If you have any questions or complaints about our Privacy Policy, please contact us at:

Bank of Industry Building,

23, Marina Street,

Lagos Island,

Lagos.

cyberdesk@boi.ng

+234 1 2715086