

Our Privacy Policy

We Value Your Privacy

At Hayat Trust NIMFBank Ltd. (hereinafter called “Hayat Trust”), we treat your personal information as private and confidential. We are dedicated to protecting your privacy and providing you with the highest level of security at any point of interaction with us. This Privacy Policy describes what personal information we collect, what we do with it and how we protect it.

This policy (together with our Terms and Conditions) sets out the basis on which any personal data we collect 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. By continuing to visit our website (www.hayattrustmfb.com) and other Hayat Trust NIMFBank Ltd. customer touchpoint, you accept and consent to the practices described in this policy.

Information we collect and use

- We collect information about you from a variety of sources, such as website visits, applications, identification documents, curriculum vitae, personal financial statements, interactions with relationship managers, and other third parties (credit bureaus, payment gateways, other financial institutions...), and other written or electronic communication reflecting information such as your name, address, passport details, identification numbers, biometric information, telephone number, location, occupation, assets, income and any other information we deem necessary.
- We may also use your transactional account history including your account balance, payment records, and debit/credit card usage. We may also use information received from third parties such as family, solicitors, friends, or employers, website/ social media pages made public by you, government agencies, regulators, supervisory or credit agencies.
- We may also collect other information such as video footage of you whenever you step into any of our branches, telephone conversations when you call any of our contact center lines, and geographic information of any of our branch ATMs when you use our ATMs.
- We also collect data from ‘Prospective Employee’ for recruitment purposes, including for medical screening.

Cookies

Cookies are small text files stored on your computer or mobile devices whenever you visit a website. Cookies have many uses, such as memorizing your preferences to tailor your experiences while on our site– or to help us analyse our website traffic.

Hayat Trust NIMFBank Ltd. uses cookies to improve your experience while on this site.

about our cookies:

- Some cookies are essential to access certain areas of this site;
- We use analytics cookies to help us understand how you use our site to discover what content is most useful to you

Kindly refer to our cookie policy for more information on cookies.

Cookie Policy

Introduction

The objective of this policy is to communicate what cookies are, how the bank uses cookies and the options available to customers for managing cookies when using the bank's website.

Detail

What are cookies?

A cookie is a small text file that is sent to and stored in the browser directories of your device (smartphone or PC). Cookies can be used for a variety of purposes such as identifying users, keeping track of preferences and activity (e.g. Language, Currency, IP address used and Time zone).

Types of Cookies and how we use them

- **Session Cookies:** are cookies that expire when you end the session (leave the site or close your browser). Session cookies are used to store certain information while you use the site that makes navigation and your experience on our site easier and more convenient.
- **Persistent Cookies:** are cookies that remain stored on your device until their expiry dates are exceeded or until they are deleted. They are used to store preferences so that the website can remember your choices the next time you access the site. They are used to provide a more customized experience to you whenever you access our website.

In addition to the above types, If you follow a link from our website to another website, please be aware that the owner of the other website will have their own privacy and cookie policies for their site. Please check the relevant third-party website for more information on their use of cookies.

Keeping Your Personal Information Safe

- Our cookies never store personal or sensitive information; they simply hold a unique random reference to you so that once you visit the site we can recognize who you are and provide certain content to you
- The cookies we use cannot read or search your computer or mobile device to obtain information about you or your family, or read any material kept on your device.

Cookie Preferences

Various browsers have different methods of managing cookies (including disabling options). However, you should note that some cookies are essential and disabling them may result in some functions or services not functioning properly. For more information on how to manage cookies, please refer to: <https://www.aboutcookies.org>

Cookie Consent

In compliance with the extant Data Protection Regulations like the General Data Protection Regulation (GDPR), websites associated with our organization, provide consent notices that give customers the option to opt-in and also get more detailed information about our cookies.

Updates of this Policy

We may update this policy from time to time. Kindly review this policy from time to time to ensure that you have up-to-date information.

Use of personal information

The collection and use of personal data by Hayat Trust NIMFBank Ltd. is guided by certain principles. These principles state that personal data should

- be processed fairly, lawfully and in a transparent manner.
- be obtained for a specified and lawful purpose and shall not be processed in any manner incompatible with such purposes.
- be adequate, relevant and limited to what is necessary to fulfil the purpose of processing.
- be accurate and where necessary, up-to-date. In the event data is inaccurate, steps should be taken to rectify or erase such data.
- Not be kept for longer than necessary for the purpose of processing.

- be processed in accordance with the data subject's rights
- be kept safe from unauthorised processing, and accidental loss, damage or destruction using adequate technical and organizational measures.

Any personal information provided by you to Hayat Trust NIMFBank Ltd. will be used with your consent, or when we have another lawful reason. These include

- Cases where processing of personal data is required for the fulfilment of a contractual obligation.
- Cases where processing of personal data is required for compliance with legal and/or regulatory requirements.
- Cases where processing is required to protect your vital interest or that of any other natural person.
- Cases where processing is required for an activity to be carried in significant public interest.
- Cases where processing is required for legitimate interests of Hayat Trust NIMFBank Ltd. or a third party insofar as this does not conflict with the requirements for the protection of your personal data.

Your personal information is used in:

- Updating and enhancing Hayat Trust NIMFBank Ltd. records

- Executing your instructions.
- Establishing your identity and assessing applications for our products and services
- Pricing and designing our products and services
- Administering our products and services

- Managing our relationship with you
- Managing our risks
- Identifying and investigating illegal activity (i.e.), such as fraud
- Contacting you, for example in instances where we suspect fraud on your account or when the need arises to tell you about recent occurrences in the banking sector or some event(s) of significance.
- Conducting and improving our businesses and improving your experience with us
- Reviewing credit or loan eligibility.
- Preventing money laundering or terrorism financing activities.
- Complying with our legal obligations and assisting government and law enforcement agencies or regulators/supervisors
- Identifying and informing you about other products or services that we think may be of interest to you.
- Processing your job application if you apply for a job with us, including processing your sensitive data for medical screening.

We may also collect, use and exchange your information in other ways permitted by law.

Automated Processing

We sometimes use automated systems and software to help us reach decisions about you, for example, to make credit decisions, to carry out security, fraud and money laundering checks, or to process your data when you apply for some of our products and services.

This type of processing is carried out under lawful basis and you can contact us to request that automated processing be reviewed by a human being if you detect any inaccuracies in your personal data.

Information we share

We may share the information about you and your dealings with us, as collected and for such use above, and to the extent permitted by law or by you, with the following:

- Hayat Trust NIMFBank Ltd. Branches and Subsidiaries
 - Regulators/Supervisors, Government Agencies/courts - It may be necessary by law, legal process, litigation, and/or requests from public and governmental authorities within or outside your country of residence for Hayat Trust NIMFBank Ltd. to disclose your personal information. We may also disclose information about you if we determine that for purposes of national security, law enforcement, or other issues of public importance, disclosure is necessary or appropriate.;
 - External Auditors;
 - Hayat Trust NIMFBank Ltd. staff;
 - Credit Agencies;
 - Correspondent banks;
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- Hayat Trust NIMFBank Ltd. strategic partners/service providers – for the purpose of improving and providing our products and services to you. Your Personal information will not be shared with third parties for their marketing purposes.
 - We may also disclose information about you if we determine that disclosure is reasonably necessary to enforce our terms and conditions or protect our operations or

users. Additionally, in the event of a reorganization, merger, or sale we may transfer any and all personal information we collect to the relevant third party.

- Information about our customers and their usage of our website is not shared with third parties for their marketing purposes. We do not disclose any information about any user's usage of our web site except in specific cases, and we do not share information with any unaffiliated third parties for marketing purposes unless you expressly give us permission to do so.

- **How we protect your information**
- We take appropriate technical and organizational measures to prevent loss, unauthorized access, misuse, modification or disclosure of information under our control. This may include the use of encryption, access controls and other forms of security to ensure that your data is protected. We require all parties including our staff and third-parties processing data on our behalf to comply with relevant policies and guidelines to ensure that information is protected in use, when stored and during transmission.

- Your personal information with us remains secure because:
- We use strict security measures and technologies to prevent fraud and intrusion.
- Our Security controls and processes are regularly updated to meet and exceed industry standards.
- Our employees are trained to respect the confidentiality of any personal information held by us

- Where we have provided you (or where you have chosen) a password which grants you access to specific areas on our site, you are responsible for keeping this password confidential. We request that you do not to share your password or other authentication details (e.g. token generated codes) with anyone. Other security measures you can take that will help us protect your data can be found at www.hayattrustmfb.com

- **Where we store your Information**
- All Personal Information you provide to us is stored on our secure servers as well as secure physical locations and cloud infrastructure (where applicable) for the purposes of providing seamless services to you, including but not limited to ensuring business continuity, the data that we collect from you may be transferred to or stored in cloud locations at globally accepted vendors' data center. Whenever your information is transferred to other locations, we will take all necessary steps to ensure that your data is handled securely and in accordance with this privacy policy.

- **How long we store your information**
- We retain your data for as long as is necessary for the purpose(s) that it was collected. Storage of your data is also determined by legal, regulatory, administrative or

operational requirements. We only retain information that allows us comply with legal and regulatory requests for certain data, meet business and audit requirements, respond to complaints and queries, or address disputes or claims that may arise.

- Data which is not retained is securely destroyed when it is identified that is no longer needed for the purposes for which it was collected.

- **Your rights**

- You have certain rights available to you, these include
- The right to access your personal information held by us. Your right of access can be exercised by sending an email to info@hayattrustmfb.com The right to rectify inaccurate or incomplete information.
- withdraw consent for processing in cases where consent has previously been given.
- restrict or object to processing of your personal data. We might continue to process your data if there are valid legal or operational reasons
- You also have the right to:
- Request that your personal data be made available to you in a common electronic format and/or request that such data be sent to a third party.
- Request that your information be erased. We might continue to retain such data if there are valid legal, regulatory or operational reasons.
- If you suspect any violation of your right, you can send your complaint to the Data Protection supervisory authority in Nigeria, the Nigerian Data Protection Commission (NDPC), at info@ndpc.gov.ng ; additionally, it can also be addressed to frauddesk@hayattrustmfb.com

- **Maintain accurate information**

- Keeping your account information accurate and up to date is very important. You have access to your account information, which includes your contact information, account balances, transactions and similar information through various means, such as account statements, SMS Banking, Social Media Banking and Internet Banking.
- If you discover any inaccuracies in your personal information, please promptly notify us, via our branch network or Contact Centre, and provide the required documentary evidence, to enable us to implement the necessary updates or changes.

- **Applicability of this privacy policy**

- Hayat Trust NIMFBank refers to Hayat Trust NIMFBank Ltd and its subsidiaries.
- Hayat Trust NIMFBank Ltd comprises of Hayat Trust NIMFBank Ltd. Branches.

- **Third party sites and services**

- Hayat Trust NIMFBank Ltd. websites, products, applications, and services may contain links to third-party websites, products and services. Our products and services may also use or offer products or services from third parties. Information collected by third parties, which may include such things as location data or contact details is governed by their privacy practices and Hayat Trust NIMFBank Ltd. will not be liable for any breach of confidentiality or privacy of your information on such sites. We encourage you to learn about the privacy practices of those third parties.

- **Social medium platforms**
 - Hayat Trust NIMFBank Ltd. may interact with registered users of various social media platforms, including Facebook, Twitter, LinkedIn and Instagram. Please note that any content you post to such social media platforms (e.g. pictures, information or opinions), as well as any personal information that you otherwise make available to users (e.g. your profile) is subject to the applicable social media platform's terms of use and privacy policies. We recommend that you review this information carefully in order to better understand your rights and obligations with regard to such content.
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- **Social Events**
 - **Maintaining accurate information**
 - Keeping your account information accurate and up to date is very important. You have access to your account information, which includes your contact information, account balances, transactions and similar information through various means, such as account statements, SMS Banking, Social Media Banking and Internet Banking. If you discover any inaccuracies in your personal information, please promptly notify us, via our branch network or Contact Centre, and provide the required documentary evidence, to enable us to implement the necessary updates or changes.
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- **Privacy of children**
 - Hayat Trust NIMFBank Ltd. Policy contains the following disclosure statement for children:
 - "Hayat Trust NIMFBank Ltd. respects the privacy of children. We do not knowingly collect names, email addresses or any other personally identifiable information from children. We do not knowingly market to children nor do we allow children under 18 to open online accounts."
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- **Promotional messages**
 - Hayat Trust NIMFBank Ltd. may sometimes contact you with products or services that we think may be of interest to you. If you don't want to receive such promotional materials from us, you can opt out at any time by sending an email to info@hayattrustmfb.com or frauddesk@hayattrustmfb.com
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- **Privacy policy changes**
 - This policy may be revised on an ad-hoc basis to reflect the legal, regulatory and operating environment and such revised versions will automatically become applicable to you. We will post any revisions we make to our Privacy Policy on this page and such revised policy becomes effective as at the time it is posted. We will notify you when any changes to our privacy policy have been made. We also encourage you to check this page from time to time for updates to this policy.

- **Contact**
- Questions, comments and requests regarding this privacy policy are welcomed and should be addressed to info@hayattrustmfb.com or frauddesk@hayattrustmfb.com.
- To contact our Data Protection Officer, kindly address your request to “The Data Protection Officer” at 23 Ibadan Road, Ijebu Ode, Ogun State, Nigeria.