

## PRIVACY POLICY

This Privacy Policy (“Policy”) sets out the basis on which any personal data we collect from you or that you provide us will be processed by us, including the type of information being collected, the method of such information collection, the use of such information, the protection of such information, and the sharing of such information with third parties. The policy applies to all the products, subscriber-based services, mobile applications (“services”), and websites offered by Ultimate Microfinance Bank Nigeria Limited (“Ultimate Microfinance Bank”), “Us”, “We”) or its numerous branches or affiliated companies.

We encourage you to review the privacy policy whenever you interact with us to stay informed about our information practices and the ways you can help protect your privacy.

### ◆ INFORMATION WE COLLECT

When you use our websites and services, we collect and store your personal information, which you provide from time to time. Personal information in this context shall include all data such as: full legal name, bank verification number, phone number, means of identification, identification number, mailing address, email address, tax ID, a photo, biometric information, occupation, assets, income, location data, an online identifier, and other unique identifiers such as but not limited to MAC address, IP address, IMEI number, IMSI number, and SIM.

We collect information when you create an account, subscribe, participate in any interactive features of our services, fill out a form, apply for a loan, use your credit or debit cards, request customer support, or otherwise communicate with us.

We may obtain information through our mobile applications that you install on your mobile devices to access and use our services.

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, or geographic information.

We are the custodians of data on behalf of the users that use our services, and we do not own data; users own their data. We will store the data provided for only the period within which it is reasonably needed.

### ◆ WHAT WE DO WITH YOUR INFORMATION

The collection and use of personal data by Ultimate Microfinance Bank 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 that data is inaccurate, steps should be taken to rectify or erase such data.
- Not to be kept for longer than necessary for the purpose of processing.
- Be processed in accordance with the data subject’s rights, and
- Be kept safe from unauthorized processing and accidental loss, damage, or destruction using adequate technical and organizational measures.

We will only use your information when you have provided your consent or when we are required by law to do so. 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 out in significant public interest.
- Cases where processing is required for the legitimate interests of Ultimate Microfinance Bank or a third party, insofar as this does not conflict with the requirements for the protection of your personal data.

We will use your information for the following:

- To provide customers with excellent products and services, to manage our business, and to offer an enriched and enhanced customer experience.
- To make appropriate use of your data to manage transactions, respond to your requests, and provide you with more relevant products and services.
- To deliver our products and services, carry out your instructions, and provide online banking, mobile banking, and other online products and services.
- To review credit or loan eligibility and fulfil loan requests made by you.
- To detect and prevent financial crimes, including fraud, financing for terrorism, and money laundering, this is necessary to ensure security and business continuity.
- To meet our compliance obligations, to comply with laws and regulations, and to share with regulators when necessary.
- To process your job application if you apply for a job with us, including processing your sensitive data for medical screening.
- To deliver advertising to you directly or on our websites, provide updates on special deals and offers that might interest you (unless you tell us otherwise), and
- To send you general announcements or important news about your account and request your feedback, and we believe you should be able to select what kinds of information you receive from us via email.
- We may also collect, use, and exchange your information in other ways permitted by law.

#### ◆ SECURITY OF INFORMATION

We adopt appropriate technical, data collection, storage, and processing practices and security measures to protect against unauthorized access, misuse, alteration, disclosure, or destruction of your personal information, username, password, transaction information, and data 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 confidentiality and that information is protected in use, when stored, and during transmission. Our security controls and processes are also regularly updated to meet and exceed industry standards.

Where we have provided you (or where you have chosen) a password that grants you access to specific areas of our site, you are responsible for keeping this password confidential. We request that you do not share your password or other authentication details (e.g., token-generated codes) with anyone.

#### ◆ DATA RETENTION

We retain your data for as long as it is necessary for the purpose(s) for which it was collected. The storage of your data is also determined by legal, regulatory, administrative, or operational

requirements. We only retain information that allows us to 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 that is not retained is securely destroyed when it is identified as no longer needed for the purposes for which it was collected.

#### ◆ CROSS-BORDER PERSONAL DATA TRANSFERS

Ultimate Microfinance Bank is committed to protecting customers' personal information regardless of where the data resides and to providing appropriate protection for where such data is transferred across borders, including outside of Nigeria. To ensure that these transfers are in line with permissible conditions outlined by the Nigerian Data Protection Regulation, we have taken appropriate and suitable safeguards to ensure that personal data will remain protected when cross-border transfers occur. These safeguards include transferring personal data to countries with adequate data protection regulations and ensuring that standard contractual clauses are in place to mandate that personal data is secured using best practices.

#### ◆ NOTIFICATION OF CHANGES TO PRIVACY POLICY

We review this privacy policy regularly and reserve the right to make changes at any time to take account of changes in our business and legal requirements. The policy on this page and such revised policies become effective as of the time they are posted. Hence, our privacy policies will be dated to reflect the most recent update.

#### ◆ CONTACT US

We are dedicated to protecting your privacy. If you have any questions or comments regarding this policy or any complaints concerning our compliance with it, please contact our Data Protection Officer at [dataprotection@ultimatemfb.com](mailto:dataprotection@ultimatemfb.com) or the Contact Centre by phone at +234 (0) 817 7724507 or by email at [info@ultimatemfb.com](mailto:info@ultimatemfb.com). We will use reasonable efforts to respond promptly to requests, questions, or concerns.

#### ULTIMATE MFB WHISTLE BLOWING & COMPLAINT POLICY

Dear clients,

At Ultimate MFB, we are a bank without corruption and unethical behavior. We take your indications and complaints very seriously and encourage you to send them via the below mentioned channels.

#### ◆ COMPLAINTS

Any client can send a complaint through any of the three complaint management channels:

Email [customercare@ultimatemfb.com](mailto:customercare@ultimatemfb.com)

Phone +234 (0)8177724507

Complaint/Suggestion Box (Head office)

Complaints will be treated confidentially and professionally.

IMPORTANT: For the purpose of feedback the following information is required while sending a complaint:

- ✓ Name and contact details;
- ✓ Relationship with Ultimate Microfinance Bank (e.g. client, guarantor);
- ✓ Transaction details such as amount, date of transaction, channel used, reference number, screenshot of transaction error message etc.
- ✓ The complaint matter;
- ✓ Details of Ultimate Microfinance Bank staff involved (if applicable);
- ✓ Copies of any documentation supporting the complaint (if applicable).

#### ◆ WHISTLE BLOWING

The objective of whistle-blowing is to bring unethical conduct and illegal violations to the attention of an authority so that actions can be taken to resolve the problem. The unethical practices may include any of the following:

- ✓ All forms of financial malpractices or impropriety or fraud;
- ✓ Failure to comply with a legal or regulatory obligation;
- ✓ Actions detrimental to health and safety or the environment;
- ✓ Any form of criminal activity;
- ✓ Improper conduct or unethical behavior;

We therefore encourage you to report any unethical activity to the bank through the dedicated E-mail address: [whistle-blowing@ultimatemb.com](mailto:whistle-blowing@ultimatemb.com) and phone number: 09158578166 Head, Internal Audit

All calls and messages will be treated confidentially