



IMPERIAL HOMES MORTGAGE BANK LIMITED

PRIVACY POLICY

Approval Page

	DESIGNATION	SIGNATURE	DATE
Initiator	Head, Information Technology		
Reviewed by	Head, Systems Control Group		
Reviewed by	Head, Legal		
Approved by	Managing Director		
Approved by	Chairman Board of Directors		

Document History

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Privacy Policy

Introduction

We are Imperial Homes Mortgage Bank Limited (“IHMB”, ‘we’, ‘our’, ‘us’) and operate under the name Imperial Homes Mortgage Bank Limited. We are registered with the Corporate Affairs Commission with the number RC177098.

This policy describes what information we collect about you, how we collect and use the information you share with us, and with whom we share that information. You don’t have to share any information with us, but to use our services, we’ll need some information from you. This policy also contains information about when we share your personal information with third parties (such as our service providers and credit bureaus).

We are devoted to guarding your Personal Information while you use “our” services. By continuing to use “our” services, you acknowledge that you have reviewed the Privacy Policy and agree to its terms. This also means that you have agreed to the use of your Personal Data and have recognized the applicable disclosures

What information do we collect?

Information you give us on Imperial Homes app

We collect and use any information you supply when you interact with any of our touch points. When you open an account with us, you share details like your name, BVN, ID, address and a picture. By using our card or the app to transact, you also share details of your transactions with us. Additionally, we may request explicit permission to see other information like your address book, location, photos and data from your camera.

- Details you give when you sign up for an Imperial Homes account, like your BVN, name, date of birth, gender, phone number, residential address, and email address.
- Your passport photograph, utility bill, ID and signature are also collected and stored for KYC purposes
- Information you give us through the in-app forms so we can help you.

Information you give us when you contact us

If you contact via other means than through the app, we collect the following information so we can answer your questions or take action.

- The phone number you’re calling from and information you give us during the call
- The email address you use and the contents of your email (and any attachments).

- Public details from your social media profile (like Facebook, Instagram or Twitter) if you reach out to us via these platforms, and the contents of your messages or posts to us.

Information we collect when you use Imperial Homes website

- The mobile network and operating system you use,
- Your IP address and device ID
- Your phone contacts so you can make airtime purchases or pay contacts on Imperial Homes

Information we get from third parties

As part of our KYC (Know Your Customer) process, we run checks on the ID information you supply during signup. Also, we run further checks with the credit bureaus to check if we can offer you an overdraft.

How do we use your information?

The Nigerian Data Protection Regulation says we need to have a lawful basis for using your personal information. At least one of the following must apply: contractual or legal duty, legitimate interest, public interest, vital individual interest or consent.

1. Contractual Obligation

We collect certain data from you to fulfil the contract we have with you, or to enter into a contract with you. We use this data to:

- Give you the services we agreed to in line with our terms and conditions.
- Send you messages about your account and other services you use if you get in touch, or we need to tell you about something.
- Exercise our rights under contracts we've entered into with you, like managing, collecting and recovering money you owe us.
- Investigate and resolve complaints and other issues.

2. Legitimate Interest

In some instances, we need to use the data you supply us for our legitimate interests. This means we're using your data in a way that you might expect us to, for a reason which is in your interest and doesn't override your privacy, interests or fundamental rights and freedoms.

3. Public interest

- Where processing is necessary for the performance of a task or function carried out in the interest of the public. We have to ensure we aren't breaking any laws by banking you by preventing illegal activities like money laundering and fraud. To do this, we need your data to confirm your identity when you sign up or get in touch with us.
- To comply with: local or foreign laws, regulations, voluntary codes, directives, judgments or court orders, regulator, or enforcement agency; policies (including the Imperial Homes Mortgage Bank policies), good practice, government sanctions or embargoes, reporting requirements under financial transactions legislation and demands or requests of any authority, regulator, tribunal, enforcement agencies [i.e. the Nigeria Financial Intelligent Unit ("NFIU") and the Economic and Financial Crime Commission ("EFCC"), or exchange body, this processing activity will be based on a legal obligation.
- Adhere to banking laws and regulations (these mean we sometimes need to share customer details with regulators, tax authorities, law enforcement or other third parties).

4. Consent

For certain information, we'll ask for your consent. We'll ask for your consent to:

- Market and communicate our products and services. You can always unsubscribe from receiving these if you want to
- Help protect you against fraud by tracking the location of your phone if you've authorized it
- View your contact list for airtime purchases.

Who do we share your information with?

We will usually not share your Personal Data with other third parties without your consent.

Where we need to transfer your data to another country, such country must have an adequate data protection law. Where the country does not have adequate data protection

law, we shall ensure that such transfer is subject only to the exceptions contained in Article 2.12 of the Nigeria Data Protection Regulation 2019.

In some instances, we will share the information provided with some third parties that we do business with, like card producers and credit agencies, or with law enforcement agencies when required. When we share your data with third parties, it is kept strictly private and will be used for reasons that we have described.

Third parties we share your information with are listed below:

- Your relatives or, guardians (on your behalf where you are incapacitated or unable) or other people or organizations associated with you or your lawyer.
- Where you have named an alternative contact (such as a relative) to speak with us on your behalf. Once you have told us your alternative contact, this person will be able to discuss all aspects of your policy (including claims and cancellation) with us and make changes on your behalf.
- Financial Institutions who are our clients for the provision of both banked and unbanked service provision.
- Fraud detection agencies and other third parties who operate and maintain fraud detection registers.
- The police and other third parties or law enforcement agencies where reasonably necessary for the prevention or detection of crime.
- Central Bank of Nigeria and other regulators.
- Our third-party services providers such as IT suppliers, auditors, lawyers, marketing agencies, research specialists, document management providers and tax advisers.
- Customer satisfaction survey providers.
- Credit bureau.
- Disclosure of your personal information to a third party will only be made where the third party has agreed to keep your information strictly confidential and shall only be used for the specific purpose for which we provide it to them.

We may also disclose your personal information to other third parties where:

- We are required or permitted to do so by law or by regulatory bodies such as where there is a court order, statutory obligation.
- We believe that such disclosure is necessary in order to assist in the prevention or detection of any criminal action (including fraud) or is otherwise in the overriding public interest; or exemptions under the data protection legislation allow us to do so.

How long do we keep your data?

We keep your information as long as you are an Imperial Homes customer and for any additional period as required under applicable law or regulations.

These retention requirements supersede any right to erasure requests under applicable data protection laws. We cannot therefore erase your data in relation to your Imperial Homes Account until after this time period, however we can assure you that your data will be held safely and securely whilst under our supervision.

Where do we store your data?

The Personal Data that we collect from you will be transferred to and stored at destinations within Nigeria. By submitting your Personal Data, you agree to this transfer, storing or processing. We will take all steps reasonably necessary to ensure that your Personal Data is treated securely and in accordance with this Policy.

How do we secure your data?

We adopt robust technologies and policies to ensure the Personal Data we hold about you is suitably protected. We take steps to protect your information from unauthorized access and against unlawful processing, accidental loss, destruction and damage.

Where you have chosen a password that allows you to access certain parts of the website and mobile application, you are responsible for keeping this password confidential. We advise you not to share your password with anyone.

We have also taken measures to comply with global Information Security Management Systems (ISMS). We therefore have put in place digital and physical security measures to limit or eliminate possibilities of data privacy breach incidents.

However, please note that no system involving the transmission of information via electronic storage systems or the internet is completely secure

When do we delete your data?

We are basically storing and processing your personal data only as long as it is necessary to perform our obligations under the agreement with you or as long as the law requires us to store it.

If you choose to delete your Imperial Homes account, we will delete any data you have previously given us.

What are your rights?

- You have a right to consent to this Policy and to withdraw your consent at any time

- You have the right to access and request the information that we have of you in our records, ask that we update the personal information we hold about you or correct such personal information which you think is incorrect or incomplete, and we will grant this request as long as we're legally allowed to
- You may also ask us to delete our record of you, restrict the way in which we use your personal information.
- You also have the right to object to us using your information for our marketing purposes or any additional services we may be offering you.
- You have a right to lodge a complaint about the handling of your Personal Data with the National Information Technology Development Agency ("NITDA").

NITDA's website (<https://nitda.gov.ng/nit/>) has a wealth of useful information in respect of your rights over your Personal Data.

If you wish to exercise your rights, you may contact the office of our Data Protection Officer at compliance@imperialmortgagebank.com.

Where we do not act on your request to exercise any of your rights, we shall inform you within one month of the receipt of your request, of the reasons for not taking action and on the possibility of lodging a complaint with NITDA.

BREACH/ PRIVACY VIOLATION

In the event of a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to your Personal Data, IHMB shall within 72 (seventy-two) hours of having knowledge of such breach report the details of the breach to NITDA. Furthermore, IHMB shall inform the Data Subject of the breach incident, the risk to the rights and freedoms of the Data Subject resulting from such breach and any course of action to remedy the said breach.

If you feel that your Personal Data has not been handled correctly or you are unhappy with our response to any requests you have made to us regarding the use of your Personal Data, you have a right to lodge a complaint with the NITDA. The contact details are:

National Information Technology Development Agency

Tel: +234929220263, +2348168401851, +2347052420189

Email: info@nitda.gov.ng

Website: www.nitda.gov.ng

How to make a complaint

At Imperial Homes, we are extremely committed to respecting and protecting your information. If you have any worries or reservations about your personal information, please contact our Data Protection Officer by:

- Sending a message via the app
- Emailing us at info@imperialmortgagebank.com and complaints@imperialmortgagebank.com
- Writing to us at 27 Keffi Street, Off Awolowo Road, Ikoyi, Lagos, Nigeria.

Changes to this document

This document will be reviewed on a yearly basis by our Data Protection Officer. If we make any changes, we will add a note to this page and let you know by email.