

UNIVERSAL MERCHANT BANK LTD (UMB) DATA PRIVACY STATEMENT

INTRODUCTION

Universal Merchant Bank Ltd is a universal bank licensed by the Bank of Ghana and registered as Data Controller with the Ghana Data Protection Commission. As part of the on-boarding process otherwise **known as 'Know Your Customer' your account creation with** us begins with collecting personal data from you and some special characters of personal data to ensure our relationship with you set off well. As a Data Controller, we are bounded by the Ghana Data Protection Act, 2012 (843) as we seek to obtain some personal data and special characters from you.

WHAT PERSONAL DATA WE COLLECT

Personal data that we may process, as appropriate throughout the on-boarding process includes, but is not limited to:

1. Name and contact details (such as telephone number, e-mail address, residential address, and postal address).
2. Date of birth
3. Evidence of identity such as national ID/passport/resident card.
4. Video, photographic images or audio recordings submitted or made as part of the on-boarding process.

We may also process sensitive or special Personal Data where relevant to the customer on boarding process and where laws permit us to do so, including where necessary to accommodate any special requirements.

Sensitive or special Personal Data processed may include but is not limited to screening for:

1. criminal record.
2. Adverse media on you.
3. Any Sanction matches
4. Disability status.

The Bank is committed to treating every prospective customer fairly in the on boarding process as part of our application process. These questions are asked purely for the purposes of furthering those aims and creating a diverse and inclusive working environment.

We also process Personal Data provided by you in relation to third parties when it relates to your

application for account opening with UMB, such as details of your referees or declaring close personal relationships, close financial relationships, client, and business partner connections for the purpose of protecting UMB and its customers from conflicts of interest, fraud, and other financial crime. It is your responsibility to ensure anyone about whom you provide us with Personal Data is made aware that you are providing their Personal Data and for what purpose.

HOW WE COLLECT YOUR PERSONAL DATA

We collect Personal Data in the following ways:

We collect personal data directly from you without any intermediary. The Bank has no agency relationship with any entity to collect personal data on its customers. The Bank as a Data Controller can be represented by any of its staff to collect your personal data. We shall however screen your personal name against data bases in certain websites.

1. UN Sanction list
2. EU Sanction List
3. Internally Generated Blacklist
4. Social Media Network Sites

We will not collect your photographs or videos from any Social Network Site unless you submit a photograph or video voluntarily as part of your on-boarding process.

We may also obtain your contact details from publicly available sources, including content that you have made public on Social Network Sites for professional purposes to make initial contact with you for recruitment purposes. If we contact you in this way, you will be given the opportunity to opt out of receiving any further information about career opportunities with UMB and you can subsequently opt out at any time by contacting privacy.data@myumbbank.com

TO WHOM WE MAY DISCLOSE YOUR PERSONAL DATA

UMB operates locally in Ghana but have customers globally, despite that we do not have any authorized employee, agent and adviser in other countries that may be involved in processing your on-boarding application process.

We are however expected to comply with other enactments that are not necessarily made in Ghana but

from jurisdictions that you may be residing. On that basis we may be enjoined by the requirements of **that nations Data Protection demands to submit your data to that country's Data Protection Commission.**

In Ghana your Personal Data may be disclosed to any of the following for any of the purposes outlined above:

1. Law Enforcing Agencies (Police, Office of the Special Prosecutor (OSP), Economic and Organized Crime Office (EOCO) and others) for investigation and intelligence gathering.
2. The Bank of Ghana as part of their regulatory function and other regulatory bodies, e.g. Ghana Revenue Authority, Securities and Exchange Commission, National Pensions Regulatory Authority, National Insurance Commission.
3. Corresponding Banking Partners as part of their request for information on any transaction performed through them.
4. Any court, tribunal, Regulatory Authority or Governmental Entity.
5. Any criminal records bureau, credit bureau or credit reference agency when conducting background checks.
6. Financial Intelligence Centre for performance of their function as intelligence gathering institution.
7. Third parties to verify the accuracy of the Personal Data you provide us with for background screening; and
8. Third parties to whom we may transfer our rights and/or obligations under any agreement, **including but not limited to a potential merger or acquisition of all or part of the Bank's business.**
9. In some circumstances, we may provide your Personal Data to a third party who will determine how and why it will be processed. For example, where allowed by law we may transfer your personal data to third parties we are partnering for product development.
10. **The Bank is an equal opportunity for all customers, and it's committed to a diverse and inclusive customer and will always consider any reasonable adjustments which could be made to accommodate special requirements.**

HOW LONG DO WE RETAIN YOUR PERSONAL DATA?

Personal Data is retained if necessary for the purpose for which it is collected and to meet legal, regulatory, and operational requirements. Retention periods begin counting upon exiting relationship for a minimum period of 5 years. At the end of the retention period, non-identifiable data is kept for management information purposes.

UMB may also retain your contact information for the purposes of inviting you to join our respondent surveys that are taken for customer services enhancement. If you join our Surveys Network, you will receive information about UMB, invitations to events and/or receive information regarding our products that may be relevant to you. If you choose not to join the Survey Network, we will record that fact and will only retain the minimum Personal Data necessary to ensure you are not contacted again about any survey.

HOW WE PROTECT YOUR PERSONAL DATA

The security of your Personal Data is important to us and UMB implements technical and organizational measures to safeguard your personal data.

As a Bank, UMB manages its customers resources on a Bank wide basis and authorized personnel may access your Personal Data in any department or unit in which UMB operates. Your Personal Data may therefore be transferred to employees, agents, advisors, or third-party service suppliers, and other third parties authorized to act on our behalf in departments and units. When using external service providers, we require that they adhere to security standards mandated by UMB and regardless of where Personal Data is transferred, we take all steps reasonably necessary to ensure that it is kept securely.

If you are a European and applying a patronizing UMB product, we will ensure that we incorporate in our data privacy with the principle in your home country when dealing with you.

You should be aware that the Internet is not a secure form of communication and sending and receiving information over the Internet carries with it risks including the risk of access and interference by unauthorized third parties. We do not accept responsibility or liability for the confidentiality, security, or integrity of your Personal Data in connection with its transmission over the Internet.

UPDATING YOUR PERSONAL DATA/PROFILE

The Bank shall intermittently contact you for reconfirmation of your personal data with us from a period between a year and four years from the date of your on-boarding. In case there is a trigger events we may also approach you to reconfirm/update your personal data. We also urge you to approach us through any of our channels if any of your personal data has changed.

It is therefore a joint responsibility to maintain and update the personal data provided by you in your profile and UMB may from time-to-time request, via email that you update your Personal Data to ensure it is accurate. You can access, update, or delete your Personal Data in your profile at any time.

AUTOMATED MARKETING OF UMB PRODUCT

UMB uses several assessments across its products and which ones you encounter depend on the product for which you are patronizing. These assessments may include surveys, comments, feedback solicited based on the personal information we have on you.

We may send an automated marketing messages containing new products and other new regulatory directive covering our relationship with you through the agreed channel(s) we have on you and may include 'WhatsApp' messaging.

BACKGROUND SCREENING

If you open an account with UMB, the accuracy of the Personal Data you have provided will be verified by our third-party background screening vendors whose application may have been integrated into our system.

A criminal record search will be undertaken, where allowed by applicable law. You may also be required to consent to such checks being undertaken. If you do not give your consent where required, we will not be able to continue with the on-boarding process including the exiting of relationship.

We may also use the services of a credit reference agency ("CRA") to verify public information such as court judgments, bankruptcies, decrees, and administration orders. The CRA will record that such a search has been made about you.

Where there are anomalies or discrepancies you will be contacted by the Bank, and you may be required to supply further personal data to enable further enquiries/verification to be completed.

If you do not provide information where requested, provide misleading, false, or inaccurate information or withhold any material information, we reserve the right to stop the process including reporting to the Law Enforcing Agencies.

VIDEO INTERVIEWS

If you are selected to participate in a video survey, you will be directed towards our third-party digital platform, where you will need to provide verbal responses to pre-set questions displayed in text, and these are designed to assess your opinion on the topic being discussed.

Your recorded interview will be held securely on the third-party platform, where it may also be accessed for the provision of technical or administrative support by the parties involved in its maintenance and operation.

MINORS

UMB on-boarding activities are generally not aimed at minors. If you are a minor, you must obtain the consent of your parent or guardian before contacting UMB in relation to our on-boarding relationship. With our specialized product you can on-board with your guardian.

THIRD PARTY WEBSITES

This Privacy Statement does not apply to any processing of your Personal Data carried out by or on behalf of any third-party websites where UMB online account opening advertisements are displayed or to linked third-party websites that UMB does not operate or control.

UPDATES TO THE ON-BOARDING PRIVACY STATEMENT

This on-boarding Privacy Statement may be updated from time to time, and it is your responsibility to visit our websites regularly for the most recent version.

ACCESSING AND CORRECTING YOUR PERSONAL DATA

If you wish to access, correct, or request deletion of your Personal Data other than your profile through the website, or have questions regarding this Statement please email: [*data.privacy@myumbbank.com*](mailto:data.privacy@myumbbank.com)

If you are registered to receive alerts or other information and then subsequently you no longer wish to receive such information from us, you have the option at any time to amend your profile choices so as not to receive such alerts and/or other information from us.

YOUR RIGHT TO ERASURE

You may have the right in some circumstances to ask for some of your personal data to be deleted, for example when there is no longer a valid reason to process it. This is not an absolute right to have any personal data deleted that you wish.

YOUR RIGHT TO OBJECT TO OR RESTRICT THE PROCESSING OF YOUR PERSONAL DATA

In some circumstances you may have the right to object to how we process your Personal Data or restrict its processing, but this does not mean you can decide or choose how we process your Personal Data. If you have any concerns about how we process your Personal Data, please email: *data.privacy@myumbbank.com*

COMPLAINTS

If you have a complaint in relation to the processing of your Personal Data and you are not happy with the way we deal with it, please email: *data.privacy@myumbbank.com*

The Data Protection Office can be contacted at: Data.privacy@myumbbank.com or at Universal Merchant Bank Emporium Building Airport City, Liberation Road GP Address GL-126-4342 Accra, Ghana.

You also have the right to complain to any data protection authority that exists in the country where you have a relationship with the Bank. You may also have this right in the country in which you are located if this is different from the country with which you have a Bank relationship. For details, please email the Data Protection Commission. **Mon-Fri: 9.00-17.00, +233 (0) 256301533** info@dataprotection.org.gh. East Legon, Pawpaw Street, GPS: GA-414-1469, P.O. Box CT7195, Accra. Ghana

Please find below your consent for processing your personal data in accordance with our privacy document— are you happy to continue with the on-boarding application process?