

## **Privacy Policy**

(Version 1.1 – Date 16.12.2019)

In this Privacy Policy, we shall inform you about the collection, use and processing of personal data when using our website <https://ojirehprime.com> (hereinafter: “Website”), our web application (hereinafter: “Web App”) and our mobile app (hereinafter: “App”; jointly called: “Services”). Insofar as information refers exclusively to our Website, Web App or App, we shall explicitly point this out to you.

In this context, personal data means all detailed information about personal or factual circumstances of a specific or identifiable natural person, such as e.g. name, telephone number or address. We process your personal data either within our business relationship if you are a ojirehprime customer or when you are visiting our website for informative purposes. In addition to that - if necessary for providing our services - we transfer personal data to other companies within the ojirehprime Group or other third parties (e.g. interswitch) who process your data permissibly (e.g. to execute orders or contracts or because of your given consent). Furthermore, we process personal data coming from publicly accessible sources (e.g. records of debtors, trade registers, registers of associations, media, press, internet). The collecting and processing of publicly available data is permitted.

When using additional ojirehprime products or products of our business partners additional personal data might be collected, processed and stored. Please find details concerning the processing of additional data in the respective product category.

### **I. Responsible authority**

The authority responsible for the collection, processing and use of personal data is:

**Ojirehprime Financial Services Limited**  
**No. 4 babatope bejide crescent, Lekki phase 1**  
**Lagos State**  
**Nigeria**  
**Africa**

ojirehprime has appointed a Data Protection Officer, accessible via [personaldata@ojirehprime.com](mailto:personaldata@ojirehprime.com)

You will find more detailed information regarding **Ojirehprime Financial Services Limited** (hereinafter “ojirehprime”) in the Impressum.

### **II. Data processing purpose and legal basis**

We process your personal data in accordance with the General Data Protection Regulation (GDPR) and the Federal Data Protection Act (BDSG) if at least one of the following applies:

- The processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract (Art. 6 1b) GDPR) Personal data is processed to conduct financial services and banking transactions in order to fulfill our contractual and pre-contractual obligations. These actions are only taken when requested by you. You find the data processing purpose in the respective product category as well as in the General Terms and Conditions. The data processing can include requirement analysis, consultation, investment management, asset support as well as performing transactions.

- The data subject has given consent to the processing of his or her personal data for one or more specific purposes in case you gave your consent to the processing of your personal data for specific purposes, the processing is permitted on the legal basis of your consent. Your consent is revocable at any time. If you revoke your consent any processing of your personal data will become unlawful after the revocation. This means that the previous processing of your data remains lawful. You may request information about your given consent at any time.
- Processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data, in particular where the data subject is a child. If necessary, we process your personal data beyond our contractual obligations in order to protect our legitimate interests or the legitimate interests of a third party, e.g.
  - Data access and data transfer to credit agencies to determine credit risks
  - Examination and Optimization of processes concerning requirement analysis and customer approach including customer segmentation and calculation of probability of closure
  - Marketing or market and opinion analysis
  - Enforcement of claims and defence within legal disputes
  - To ensure IT security
  - To prevent criminal acts
  - For business management and the development of services and products
  - Risk management within the ojirehprime Group
- Processing is necessary for compliance with a legal obligation to which the controller is subject and processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller

Ojirehprime is subject to several legal obligations as well as regulatory requirements. As a result, data processing is justified according to the Anti Money Laundering Act, tax laws among others who authorize ojirehprime to process personal data in order to comply with their regulatory requirements. The purpose of processing your personal data is e.g. verification of your identity and age, prevention of money laundering and fraud, verification of your credit rating, control and reporting obligations due to tax laws and risk assessment of the ojirehprime.

- Processing on behalf of ojirehprime (Art. 28 GDPR): Where processing of personal data is carried out on behalf of ojirehprime we conclude a separate contract with the processor with respect to this processing. This contract ensures compliance with GDPR and defines sufficient guarantees for the implementation of appropriate technical and organisational measures, which ensure the protection of your rights.

## **II. Data processing within the framework of ojirehprime products**

### **1. Data collection and processing in case of opening and using the ojirehprime current account.**

Amongst others, the following data will be collected, used and processed by ojirehprime for the purpose of requesting a prepaid card and using the Services of ojirehprime:

- First name and surname
- Date of birth
- Email address
- Nationality
- Registered address
- Mobile telephone number

In order to process a prepaid card request, ojirehprime receives personal data therefore please note that it is not possible to request a prepaid card, if you don't provide your personal data.

The “Moneyflash” service is available to you within the framework of the use of our current account. You can send money to the contacts from your mobile phone via MoneyBeam without knowing their bank details. If the recipient is also an ojirehprime customer, the transactions will be carried out in real time. To enable this, ojirehprime will access the contacts stored on your end device. Furthermore, as a current account holder with ojirehprime, you are visible to your contacts if they are also customers of ojirehprime. ojirehprime shall only access your stored contacts if you previously consent to this. You will also only be visible for other customers of ojirehprime if you have previously expressly consented to this.

## **2. Data transmission in the framework of ojirehprime Credit**

If you wish to apply for a ojirehprime consumer credit, you must provide at least the following details regarding your credit request:

- details of the desired loan amount,
- details of the intended purpose of the loan,
- detailed presentation of monthly net income of the credit applicant
- details of your bank verification number and a valid means of identity

## **3. Data transmission in the framework of Facebook Custom Audience**

In order to display specific ads to our customers or to exclude them from specific campaigns we use Facebook Custom Audience. For this reason we transmit pseudonymized email addresses to Facebook, which are deleted by Facebook promptly after the match process is completed. You have the right to object to this data processing at any time. You can find further information about Facebook Custom Audiences on <https://en-gb.facebook.com/legal/terms/customaudience>.

### **III. Social Plugins**

#### **1. Use of Facebook plugins**

Plugins from the social network Facebook (Facebook Inc., 1601 Willow Road, Menlo Park, California, 94025, USA) are integrated in our Services. You can recognise the Facebook plugins from the Facebook logo or the “Like button” on our page. You can find an overview of the Facebook plugins here: <http://developers.facebook.com/docs/plugins/>.

If you visit our Services and click on the Facebook plugin, a direct connection will be established between your browser and the Facebook server. Facebook thereby receives the information that you have visited our site with your IP address. If you click on the Facebook “Like button” while you are logged into your Facebook account, you can link the contents of our pages to your Facebook profile. Thereby, Facebook can associate the visit to our Services with your user account. We hereby point out that as provider of the Services, we do not receive any information on the contents of the data transmitted or their use by Facebook. You can find further information about this in Facebook’s Privacy Policy at: <http://de-de.facebook.com/policy.php>

If you do not want Facebook to be able to associate the visit to our Services with your Facebook user account, please log out of your Facebook user account.

#### **2. Use of Twitter**

Functions of the Twitter service are integrated in our Services. These functions are offered by Twitter Inc., Twitter, Inc. 1355 Market St, Suite 900, San Francisco, CA 94103, USA. By using Twitter and the “re-tweet” function, the websites visited by you are linked to your Twitter account and announced to other users. Data are thereby also transmitted to Twitter.

We hereby point out that, as provider of the Services, we do not receive any information on the contents of the data transmitted or their use by Twitter. You can find further information about this in Twitter’s Privacy Policy at <http://twitter.com/privacy>.

You can change your Twitter privacy settings in the account settings at: <http://twitter.com/account/settings>.

#### **3. Use of LinkedIn**

Our Services use functions of the LinkedIn network. The provider is LinkedIn Corporation, 2029 Stierlin Court, Mountain View, CA 94043, USA (hereinafter: “LinkedIn”). If you visit our Services and click on the LinkedIn plugin (“recommend button”), a connection to the LinkedIn servers will be established. LinkedIn will be informed that you have visited our Services with your IP address. If you click on the LinkedIn “recommend button” and are logged into your LinkedIn account, it is possible for LinkedIn to associate your visit to our Services with your user account. We hereby point out that as provider of the pages, we do not receive any information on the contents of the data transmitted and their use by LinkedIn.

You can find further information about this in LinkedIn’s Privacy Policy at: <https://www.linkedin.com/legal/privacy-policy>



#### **4. Use of Instagram**

Functions of the Instagram service are integrated in our Services. These functions are offered by Instagram Inc., 1601 Willow Road, Menlo Park, CA, 94025, USA (hereinafter: "Instagram"). If you are logged into your Instagram account, you can link the contents of our pages with your Instagram profile by clicking on the Instagram button. Thereby, Instagram can associate the visit to our Services with your user account. We hereby point out that as provider of the Services, we do not receive any information on the contents of the data transmitted and their use by Instagram.

You can find further information about this in Instagram's Privacy Policy:  
<https://help.instagram.com/155833707900388>

#### **IV. Email newsletter**

In our email newsletter, we inform you about our offers. If you would like to receive the email newsletter, we require an email address from you. We will only send you our newsletter if you expressly consent to this as you open an account (so called double opt-in). We will thereby check whether you are the holder of the email address given or its holder is in agreement with receiving the email newsletter. This storage solely serves as proof in case a third party misuses an email address and registers to receive the newsletter without the knowledge of the entitled party. These data will only be used for sending the email newsletter and will not be disclosed to third parties.

In our newsletter, we use the Remarketing functions of the Salesforce Marketing Cloud from the service provider salesforce.com, Inc. The Landmark @ One Market Street, Suite 300, San Francisco, CA 94105, USA (hereinafter: "Salesforce"). If you consent to receiving our newsletter and visit our site via a newsletter, Cookies will be set which will enable ojirehprime to understand the customer's interest in the newsletter.

Furthermore, in the email newsletter, Salesforce uses so-called Web Beacons. Web Beacons (also called ClearGIFs or tracking pixels) are small graphics (approx. 1x1 size GIF files) which among other things are set on websites or in HTML emails in order to provide the website operators with a better understanding of visitors' interactions with the website. Web Beacons fulfil similar functions as Cookies, but they are not visible to the users. Information can be obtained via Web Beacons, in particular about whether the email was opened and whether the user's system is capable of receiving HTML emails.

You can revoke your consent to storage of the data and the email address, as well as their use for sending the email newsletter, at any time. The revocation can be made via a link in the newsletter or via a message to the contact options below.

The newsletter distribution is legally justified due to your prior qualified consent

#### **V. Profiling**

If we should use the possibility of a fully automated person related decision in order to provide our services fast and easy and if it is legally required, we will inform you upfront. You have the right that an individual person is reviewing the results of this automated decision. We process your personal data partially automated to assess certain personal aspects (profiling).

This happens e.g. in the following situations:

- In order to combat money laundering, terrorist financing and other criminal acts, which endanger financial assets. To fulfill these duties, personal data (i.a. within payment transactions) is analyzed, in order to secure our client deposits.
- With targeted marketing we try to only make offers to you which are interesting for you and which meet your needs.
- In order to evaluate your credit rating, we use scoring. Within the scoring process we calculate how probable it is that the respective customer meets his payment obligations. For the calculations we use personal data such as your salary, your expenses, existing obligations, your job, duration of employment, experiences of former contractual relations, repayment of former credits as agreed upon, as well as credit agencies' information. Your scoring is the result of a mathematical-statistical procedure and it is necessary to fulfill the obligations of our credit contract (overdraft or ojirehprime credit). The score results support our decision making, when a customer wishes to purchase an additional product and it is included in the current risk management.

## VI. Right of revocation

- **Case-related right of revocation** You have the right to revoke the processing of your personal data at any time. This does also include profiling according. In case of your revocation your personal data is not processed any longer, except when we have legitimate reasons to continue the processing, which exceed your interests, rights and liberties or when the processing is necessary to enforce, exercise or defend legal claims. The processing of your personal data remains justified until the date of your revocation.
- **Right of revocation concerning data processing for marketing purposes** In some cases, we process your personal data for direct advertising. You have the right to revoke the processing of your personal data for advertising purposes at any time. This also applies to profiling, in case it is connected to direct advertisement. In case you revoke the processing of your personal data for direct advertising purposes your personal data is not processed for this purpose. The processing of your personal data remains justified until the date of your revocation. The revocation can be made without a form requirement and should be send to the following address:

**Ojirehprime Financial Services Limited**  
**No. 4 babatope bejide crescent, Lekki phase 1**  
**Lagos State**  
**Nigeria**  
**Africa**

E-mail: [personaldata@ojirehprime.com](mailto:personaldata@ojirehprime.com)



## VII. Rights

You have the following rights concerning your personal data: right of access, right of rectification, right to erasure, right to restriction of the processing, right of revocation, right to data portability.

Please address any requests in written form to:

**Ojirehprime Financial Services Limited**  
**No. 4 babatope bejide crescent, Lekki phase 1**  
**Lagos State**  
**Nigeria**  
**Africa**  
[personaldata@ojirehprime.com](mailto:personaldata@ojirehprime.com)

## VIII. Deletion and retention periods

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. That means, if the data is not required anymore for statutory or contractual obligations, your data will normally be deleted. That rule does not apply, if its limited processing is necessary