

Our Privacy Policy

Welcome to Page International Financial Services Limited (“we” or “us” or “our”). We have described our Privacy Policy as clearly as possible in the summary below. This Policy applies to all existing and former customers and may change from time to time.

Our privacy policy describes our practices and policy for the collection of Personal Data, usage, processing, storage and disclosure of data. This deals with Personal data in all forms - written, spoken, electronic or printed – which is protected from unauthorized usage on all occasions.

The processing of your data is carried out by us in full compliance with the provisions of the Nigeria Data Protection Regulation, 2019 (“NDPR”).

Your Consent

By submitting your details and/or using our service you accept this Privacy Policy and expressly provide voluntary, specific and informed consent to the use and disclosure of your Personal Data in the manner described below. You have the right to object to our use of your Personal Data. Depending on the information you object to, we may not be able to proceed with your loan application (s) as certain information is required for the conclusion or performance of this contract and we are obliged by law to obtain same.

Security and Confidentiality

We understand the value of your Personal Data and therefore will take all reasonable steps to protect your Personal Data from loss, misuse or unauthorised alteration. Your Personal Data is stored in databases that have built-in safeguards and firewalls to ensure the privacy and confidentiality of that information. 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.

Our security systems meet or exceed industry standards and we are constantly monitoring internet developments to ensure our systems evolve as required. We also test our systems regularly to make sure our security mechanisms are up to date.

Personal Data

Personal Data is information that identifies or relates specifically to you including your financial information, for example, your name, age and identity number, your assets and liabilities, your income and your payment records. In short, any information that we know about you will be regarded as your Personal Data.

Collecting your Personal Data

We collect information about you in two ways - directly from your online application and also from outside sources such as credit bureaux and customer service providers. We may use data that identifies your Personal Data for a number of things including: statistical analysis; to develop and improve our products; to assess lending risks; to update your records; to identify which of our products, or our partners' products might interest you; to identify and prevent fraud, money laundering and other criminal activities; to carry out regulatory checks, keeping you informed about your loan, and for market research; and in the products and services which we offer on behalf of third parties.

Legal Basis for Processing of Personal Data

We will only process your Personal Data where we have a legal basis to do so. The legal basis will depend on the purpose for which we have collected and use your Personal Data.

The legal basis for processing is any of the following:

- a) **Consent:** This will apply where you have provided your consent to the processing of your personal data for one or more specific purposes.
- b) **Performance of a contract with you:** This will apply where processing is necessary for the performance of a contract to which you are a party or in order to take steps prior to entering into a contract with you.
- c) **Protection of vital interests:** This is where processing is required for the protection of your vital interests.
- d) **Compliance with law:** Where we are subject to a legal obligation and need to use your Personal Data in order to comply with that obligation.
- e) **Public interest:** Where processing is necessary for the performance of a task or function carried out in the interest of the public.
- f) **Legitimate Interest:** means the interest of our business in conducting and managing our business to enable us to give you the best services and most secure experience.

Collection and Use of Personal Data

In order to make your use of this loan product and electronic service offered by Page Financials as successful as possible, it is necessary for us to find out exactly what you need and want from us and to ascertain whether you are eligible to get a loan. The following are some of the reasons why we would collect your Personal Data:

- To identify you;
- Notify you about changes to our services;
- Improve our product to ensure that content is presented in the most effective manner for you and for your device;
- Measure or understand the effectiveness of advertising we serve to you and others, and to deliver relevant advertising to you;
- In order for us to process your instructions or requests;
- In order for us to ensure that you meet our lending criteria, we may collect and analyse your Personal Data and combine all the information that we have about you to compile a credit profile of you in order for us to grant you a loan and to meet your specific needs.

Once we have collected and analysed your Personal Data, we may send you promotional material or details which we think may be of interest to you but will only do so with your permission. If any of this promotional information relates to products, promotions, news or services of a third party, and if you indicate that you would like more details, we may inform the third party to contact you directly. We will, however, only inform a third party to contact you directly if you have indicated that this is agreeable to you.

In addition, we utilise your Personal Data for the other purposes set out in this Privacy Policy.

Additional Data Collection

In addition to the Personal Data you submit, we may collect information about your computer including, where available, your IP address, operating system and browser type - for system administration and to report aggregate information to our advertising partners which allow us to have a better understanding of our customer requirements and/or preferences by using cookies to track users as they travel from website to website recording what commercial advertisements they view and select while browsing.

This is statistical data about browsing actions and patterns and does not identify any individual. We may also obtain information about your general internet usage by using a cookie file which is stored on the hard drive of your computer. Cookies enable us to improve our service to you, estimate our audience size and usage patterns, store information about your preferences and recognise you when you return to our site.

You can set your web browser to refuse cookies, but if you do this you may not be able to enjoy full use of our site and you may not be able to take advantage of certain promotions we may run from time to time. To learn more about cookies, please visit <http://www.allaboutcookies.org/>

Please note that third parties who advertise on our site may also use cookies, but we do not have access to, or control over them and therefore cannot take responsibility for them. All advertisers are bound by contract to maintain the confidentiality and security of your Personal Data and are restricted in their use thereof as per this Privacy Policy.

We want to provide you with the best possible service, so calls to us will be recorded and/or monitored for quality checks and staff training. Recordings may also be used to help us combat fraud.

“PIN”

When you use our website and the services provided by us, you may be given an access number, user name, password and/or Personal Identification Number (PIN). You are responsible for maintaining the secrecy and confidentiality of your username, access card, password and/or PIN.

Sharing your Personal Data for Service Provision

We share the data you submit with third parties involved in the process of providing the services you request, such as lenders, credit bureaus, customer service providers and collection agencies. We have trusted relationships with these carefully selected third parties who perform services on our behalf. All service providers are bound by contract to maintain the confidentiality and security of your Personal Data and are restricted in their use thereof as per this Privacy Policy. The service provider is required to notify us immediately where there are grounds to believe your Personal Data has been accessed or acquired by any unauthorised person.

Disclosing your Personal Data

We may disclose your Personal Data for the purposes set out in this Privacy Policy to:

- our employees;
- third party suppliers and service providers;
- professional advisers;
- our existing or potential partners;
- specific third parties authorized by you to receive information held by us;

- fraud management agencies and law enforcement bodies; and
- regulatory or government bodies.

Right to Request Access to your Personal Data

As aforementioned, we are committed to the protection of your Personal Data and any information disclosed to third parties is only done with our knowledge and express authorization. You are entitled to request access to your information at no cost and to request that inaccurate, irrelevant, excessive, outdated, misleading or unlawfully obtained information be corrected, deleted or in the case of a dispute, indicate that a correction has been requested, but not made.

Your Rights in Relation to Your Personal Data

You have rights as an individual which you can exercise in relation to the information we hold about you under certain circumstances. These rights are to:

- request rectification of your Personal Data;
- request the erasure of your Personal Data;
- request the restriction of processing of your Personal Data;
- lodge a complaint about the handling of your Personal Data with the National Information Technology Development Agency ("NITDA").
- ask us not to process your Personal Data for marketing purposes. We will usually inform you (before collecting your data) if we intend to use your Personal Data for such purposes or if we intend to disclose your Personal Data to any third party for such purposes.
- be informed about the existence of automated decision-making processes, including profiling as well as meaningful information about the logic involved, the significance and the envisaged consequences of such processing.
- a copy of the Personal Data we hold about you, as well as the information about what we do with it, who we share it with and how long we hold it for.
- consent to this Privacy Policy and to withdraw your consent at any time.
- freely transfer your Personal Data received from us to any other person.

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 [bomore@pagefinancials.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.

We may however withhold Personal Data that you request to the extent permitted by law as well as where it is deemed unlawful as directed by a court order.

Retaining of Your Personal Data

We will retain your Personal Data for as long as necessary to fulfil the purposes for which it was collected, including for the purposes of satisfying any legal, regulatory, accounting or reporting requirements and our legitimate interests in maintaining such Personal Data in our records. This will normally include any period during which we are dealing or expect to deal with you and what we consider to be a suitable period thereafter, for our internal record-keeping purposes.

Third Party Links

Our site may contain links to third party websites. If you follow a link to any of these websites, please note that these websites have their own terms and privacy policies and that we do not accept any responsibility or liability for them. By registering at Page Financials you may receive follow-up contact and offers from third party companies as you have agreed to do by accepting this Privacy Policy and, while we only work with selected partners, we are not responsible for the services or representations of third parties.

Because we are not responsible for any representations or information or warranties or content on any website of any third party (including websites linked to this website or websites facilitated by us), we do not exercise control over third parties' privacy policies and you should refer to the privacy policy of any such third party to see how such party protects your privacy.

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, Personal Data, Page International Financial Services Limited shall within 72 (seventy two) hours of having knowledge of such breach report the details of the breach to NITDA. Furthermore, Page International Financial Services Limited shall within 7 (seven) days of having knowledge of the occurrence of such breach take steps to 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 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

Changes to this Privacy Policy

We reserve the right, in our sole discretion to update, modify or amend (including without limitation, by the addition of new terms and conditions) this Privacy Policy from time to time with or without notice. You therefore agree to review the Privacy Policy whenever you visit our website,

for any such change. Save as expressly provided to the contrary in this Privacy Policy, the amended version of the Privacy Policy shall supersede and replace all previous versions thereof.

Which Laws Apply?

This Privacy Policy will be governed by and construed and interpreted in accordance with the laws of the Federal Republic of Nigeria.

Who to Contact?

Should you have any queries, please contact us, Page Financials, on 01-700-7243 or customer@pagefinancials.com