

Bayport Privacy notices

Bayport considers your personal data important to us, and we want to ensure you are aware of how it is used and protected. Personal data is information that either identifies you or is about you as an individual. In this privacy statement, Bayport will provide details on how your personal data is collected, processed and shared where applicable. This statement will also highlight rights of our customers and how you can exercise them. Bayport will from time to time provide you with additional privacy information where applicable.

The nature of the services provided by Bayport requires some personal data to be obtained in order to provide the requisite services, manage our relationship with our clients and to ensure the normal course of operations. This applies to customers who have accounts/products with Bayport or hold accounts in trust.

In cases where a customer has multiple accounts with Bayport, information obtained for the various accounts will be linked to have an overall view of the existing relationships.

Bayport may not be able to offer products or services if customers do not provide us with the necessary personal data/information or does not want their personal data to be processed in a manner that may be considered necessary and/or is required to meet legal and regulatory obligations.

The laws of Ghana give consumers the right to limit the amount of information provided to institutions like Bayport for processing. Ghana law also requires us to inform customers how we collect, share, and protect their personal information.

Please read this notice carefully to understand what we do.

What types of personal data do we collect

We may collect the following types of personal data about you. In this privacy notice, "You" refers to you as an individual'

Personal data we collect with respect to individual and corporate client relationships is primarily limited to the information on directors and officers, other employees, direct and indirect beneficial owners and authorized persons we need to enable us to meet our due diligence obligations, signatory details and contact information of individuals we interact with to enable the provision of products and services to customers.

If you give us someone else's personal data, you must have their permission and explain to them how we'll use it

Identification data – information that identifies (uniquely or semi uniquely) you. For example, your name, your date of birth, your gender, your user login credentials, your photographs, CCTV and video recordings of you and other identifiers, including official/government identifiers such as national identification number, passport number and tax identification number

Contact data – information that allows addressing, sending or communicating a message to you. For example, your email address, your phone or mobile number and your residential or business address

Professional data – information about your educational or professional background

Financial and commercial data – your account and transaction information or information that identifies your financial position and background, status and history as necessary to provide relevant products and services. For example, your debit or credit card details, your source of funds, your financial and credit rating history

Geo-location data – information that provides or contains a device's location. For example, your internet protocol (IP) address or your cookies identifier

Behavioral data – analytics information that describes your behavioral characteristics relating to your use of our products and services. For example, usual transactional activities, browsing behavior on our websites and how you interact as a user of our products and services, or those provided by third-party organizations, such as our advertising partners and social media platform providers

Personal relationship data – information about associations or close connections between individuals or entities that can determine your identity. For example, spouse or employer relationships

Communications data – information relating to you contained in voice, messaging, email, live chats and other communications we have with you. For example, service requests.

We may sometimes need to collect special personal data about you, but we only do this if it's necessary and with your consent, or where allowed by law. This special personal data may include things like:

Racial or ethnic origin data – information which reveals your racial or ethnic origin

Biometric data – information that identifies you physically. For example, facial recognition information, your fingerprint or voice recognition information

Health data – information relating to your health status. For example, disability information relevant to accessibility

Criminal convictions, proceedings or allegations data – information about criminal convictions or related information that we identify in relation to our financial crime prevention obligations, for example, details about any criminal convictions or related information. This includes details of offences or alleged offences or convictions.

We usually get your personal data directly from you, but we may also obtain your personal data from other sources as necessary, depending on the relevant products and services that we are providing, including from:

People you know – such as:

Parents or guardians of minors. If you are a minor (normally this means if you are under 18 years old, but this might be younger depending on what was shared prior to this and where you live). We will get your parent or guardian's consent before collecting, using or sharing your personal data, your joint account holders, your referees; and other people you appoint to act on your behalf.

Businesses and other organizations – such as:

Your employer and/or company, business or organization you represent or is related to you other financial institutions and financial service providers strategic referral partners, including business alliance, co-branding partners or other companies or organizations that the Bayport Savings & Loans cooperates with based on our contractual arrangements or other joint ventures to provide relevant third-party products and services

Service partners, such as advertising and market research companies and social media platform providers

Credit reference and fraud prevention agencies regulatory and other entities with authority over the Bayport Savings & Loans, such as tax authorities, law enforcement or authorities imposing financial sanctions

Our corporate and business clients – where you receive the benefit of our services in relation to our contract with the company, business or organization you interact with. For example, resolving payment disputes with our merchant clients

Publicly available resources – such as online registers or directories or online publications, social media posts and other information that is publicly available

Cookies – when you visit, browse, or use our websites, online banking or mobile applications, we may use cookies to automatically collect certain information from your device. We may use such information, where relevant, for internal analysis and troubleshooting, to recognise you and remember your preferences, to improve the quality of and to personalize our content and to determine the security status of your account. For more information on how we use cookies and how you can control them when visiting our websites, please see our Cookie Policy

Who may have access to your personal data?

Bayport may share your personal data within the company and its parent company Bayport Management Limited (i.e. Group Office). Bayport Savings & Loans may share your personal data for the purposes of processing as set out in this statement, including with our service providers, our business partners, other third parties and as required by law or requested by any authority.

The Company limits how, and who has access to your personal data, and take steps to ensure it is kept confidential and protected when shared. Your data may be shared for the purposes of processing with the following, where relevant and allowed by law:

- Other members of the Bayport Savings & Loans
- Bayport Management Limited (Bayport Group)
- Authorised third parties
- Strategic Business Partners
- Regulatory bodies
- Law enforcement agencies
- Third parties that can verify your information
- Credit bureaus or credit reference agencies

How is your personal data managed?

All deposit taking institutions or companies are required to obtain some customers' personal information to ensure services are provided for customers without any issues

Your personal data may be processed, stored, shared, transferred or disclosed by us within the Bayport Savings and Loans and its parent company Bayport Management Limited or with other third parties for the purposes as indicated in this statement. This is to ensure Bayport operates effectively, efficiently in facilitating transactions and providing the requisite products and services to customers. In order to improve and support our processes and business operations and to comply with our legal and regulatory obligations, your personal may be disclosed cross border to other jurisdictions during the processing, storing, sharing and transferring stage.

Where recipients of your personal data are in jurisdictions that are outside Ghana, and local laws may not have similar data protection laws as Ghana, all the reasonable steps necessary to ensure that your personal data has an appropriate adequate level of protection and safeguards to comply with applicable law will be undertaken.

How is your personal data protected?

The privacy and security of your personal data is taken very seriously by Bayport Savings and Loans. To ensure your personal data is adequately protected, Management has put in place both physical and logical controls in place to safeguard and keep your personal data confidential. Bayport is currently ISO27001 certified which ensures data privacy is protected and ensure there are adequate policies to prevent data leakages. Staff of Bayport continue to receive training on data protection and data privacy safeguarding tips as part their daily engagements.

How long does Bayport keep your personal data?

For the purposes described in this privacy statement, your personal data for business operational or legal reasons will be kept while you engage with us and may retain your personal data for a period afterwards, depending on the type of personal data, in accordance with our data retention policy as required by applicable law and regulations. We will delete, anonymise, destroy and/or stop using personal data when we no longer need it.

What are your personal data protection rights?

As a customer of Bayport, you have rights in how your data is used but not limited to the following rights to;

- Access your data
- Correct your data
- Delete your data – Please note that certain personal data are required to provide our products and services to you

- Restrict or object to processing
- Data portability
- Not to provide or change or withdraw consent
- Your right to withdraw from direct marketing

Reasons we can share your personal information	Does Bayport share?	Can you limit this sharing?
For our everyday business purposes – such as to process your transactions, maintain your account(s), respond to court orders and legal investigations, or report to credit bureaus	Yes	No
For our marketing purposes – to offer our products and services to you	Yes	Yes
For joint marketing with other financial companies	Yes	No
For our affiliates' everyday business purposes – information about your transactions and experiences	Yes	No
For our affiliates' everyday business purposes – information about your credit worthiness	Yes	No
For our affiliates to market to you	Yes	Yes
For nonaffiliates to market to you	No	We don't share
To limit our sharing	Call toll-free (0) 30 274 5454– our service center will help you with your choice(s). Please note: If you are a new customer, we can begin sharing your information 30 days from the date we sent this notice. When you are no longer our customer, we continue to share your information as described in this notice. However, you can contact us at any time to limit our sharing	
Questions	Call toll-free (0) 30 274 5454	
Who are we		
Who is providing this notice?	Bayport have adopted this Privacy Statement	
What we do		
How does Bayport protect your personal information?	To protect your personal information from unauthorized access and use, we use security measures that comply with	

	Ghanaian law. These measures include computer safeguards and secured files and buildings
How does Bayport collect my personal information?	We collect your personal information, for example, when you: <ul style="list-style-type: none"> ▪ Open an account or apply for a loan ▪ Use your phone or make deposits or withdrawals from your account ▪ Tell us about your investment or retirement portfolio. We also collect your personal information from others, such as credit bureaus, affiliates, or other companies.
Why can't I limit all sharing?	Ghana's law gives you the right to limit only: <ul style="list-style-type: none"> ▪ Sharing for affiliates' everyday business purposes – information about your credit worthiness ▪ Affiliates from using your information to market to you
What happens when I limit sharing for an account, I hold jointly with someone else?	Your choices will apply individually – unless you tell us otherwise.
Definitions	
Affiliates	Companies related by common ownership or control. They can be financial and nonfinancial companies. <ul style="list-style-type: none"> ▪ Our affiliates include companies with a Bayport name
Nonaffiliates	Companies not related by common ownership or control. They can be financial and nonfinancial companies. <ul style="list-style-type: none"> ▪ Bayport does not share with nonaffiliates so they can market to you
Joint Marketing	A formal agreement between Bayport and nonaffiliated financial companies that together market financial products or services to you. <ul style="list-style-type: none"> ▪ Our joint marketing partners include financial services companies
Other Important information	
You may have other privacy protections under applicable laws. To the extent these Ghanaian laws apply, we will comply with them when we share information about you	
How to contact	The Data Privacy Officer Bayport Savings & Loans 22 Nii Nortei Nyanchi Street, Airport West, Accra Ghana. PMB 248, Accra North, Ghana Email: dataprotection@bayportghana.com
Got a complaint?	If you have any concerns or complaints about how we're using your personal data, please talk to us. You can contact your branch or your Relationship Manager or contact email: support.cei@bayportghana.com

