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BAYPORT

SAVINGS AND LOANS

BAYPORT-ISMS-DOC-A05-34-3

[Sensitive]

Data Protection Policy

Version 1.0

MARCH 2026

Version	Date	Summary of Changes	Revision Author
1.0	March 2026	Establishment of Data Protection *Policy*	Innovare

Name	Title
All staff	Bayport Savings and Loans

Name	Position	Comment	Date

Directive/Requirement	Control
ISO 27001 Standard	A05.34

As a modern, forward-looking business, Bayport Savings and Loans recognises at senior levels the need to ensure that its business operates smoothly and without interruption for the benefit of its customers, shareholders and other stakeholders.

To provide such a level of continuous operation, Bayport Savings and Loans has implemented an Information Security Management System (ISMS) in line with the International Standard for Information Security, ISO/IEC 27001.

The operation of this ISMS has many benefits for the business, including:

- Protection of revenue streams and company profitability
- Ensuring the supply of goods and services to customers
- Maintenance and enhancement of shareholder value
- Compliance with legal and regulatory requirements

A Data Protection Policy is available in both paper and electronic form and will be communicated within Bayport and to all relevant stakeholders and interested third parties.

Commitment to the delivery of information security extends to senior levels of Bayport and will be demonstrated through the information security policy and the provision of appropriate resources to establish and develop the ISMS.

Top management will also ensure that a systematic review of performance of the programme is conducted on a regular basis to ensure that information security objectives are being met and relevant issues are identified through the audit programme and management processes.

A risk management approach and process will be used which is line with the requirements and recommendations of ISO/IEC 27001. Risk management will take place at several levels within the ISMS, including:

Assessment of risks to the achievement of our information security objectives Regular information security risk assessments within specific operational areas Assessment of risk as part of the business change management process
At the project level as part of the management of significant change

We would encourage all employees and other stakeholders in our business to ensure that they play their part in delivering our information security objectives.

Yours sincerely,

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Chief Executive Officer

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1 Introduction

Bayport recognises that the protection of personal data is essential to maintaining trust, respecting individual privacy and conducting responsible business operations. In the course of its activities, Bayport may collect and process personal data belonging to customers, employees, website visitors, business partners, suppliers and other individuals.

Bayport is committed to ensuring that personal data is handled responsibly, securely and transparently throughout its lifecycle, from collection and use to storage, sharing and eventual disposal. This commitment includes protecting personal data against unauthorised access, disclosure, loss, misuse or other forms of improper processing.

This Data Protection and Privacy Policy establish the principles and requirements that guide Bayport's handling of personal data. It outlines Bayport's responsibilities, explains the rights of individuals whose personal data is processed and provides a framework for

promoting accountability and compliance with applicable data protection laws, including the Data Protection Act, 2012 (Act 843) of Ghana.
Through this Policy, Bayport aims to promote confidence in its data handling practices and demonstrate its commitment to respecting privacy and protecting the personal information entrusted to it.

1.1 Purpose

The purpose of this Data Protection and Privacy Policy is to establish Bayport's commitment to protecting personal data and respecting the privacy rights of individuals whose information it collects, uses, stores, shares or otherwise processes.

This Policy explains how Bayport handles personal data and the principles that guide its data protection practices. It also informs customers, website visitors, employees, business partners, suppliers and other relevant individuals about how their personal data is managed.

1.2 Objectives

The objectives of this Policy are to:

i. Ensure that personal data is processed lawfully, fairly and transparently. ii. Protect personal data against unauthorised access, disclosure, alteration, loss or destruction.
iii. Ensure that personal data is collected for specific and legitimate purposes.

iv. Promote accountability and responsible handling of personal data.
v. Inform individuals of their data protection rights and how to exercise them.
vi. Support compliance with applicable data protection laws and regulatory requirements.

1.3 Scope

This Policy applies to Bayport, its employees, management, authorised representatives and third parties who process personal data on its behalf.

It covers personal data relating to customers, prospective customers, website visitors, employees, job applicants, suppliers, business partners and other individuals who interact with Bayport.
The Policy applies to personal data collected through Bayport's website, business operations, communication channels, service delivery activities and other relevant interactions, whether the information is held electronically or in physical records.

1.4 Roles and Responsibilities

Roles	Responsibilities
Management	Management shall provide appropriate oversight and resources to support the implementation of this Policy and ensure that personal data is handled responsibly.
Data Protection Officer	The designated officer or contact shall coordinate data protection activities, provide guidance on compliance, support the handling of individual requests and escalate data protection concerns where necessary

Employees and Authorised Representatives	Employees and authorised representatives must handle personal data responsibly, maintain confidentiality and comply with applicable data protection requirements and organisational procedures.
Third-Party Service Providers	Third parties processing personal data on behalf of the Organisation must comply with applicable contractual, confidentiality, security and data protection obligations.
Individuals Whose Personal Data Is Processed. (Data Subject)	Individuals are encouraged to provide accurate information and use the Organisation's designated communication channels to submit data protection requests or raise privacy concerns.

2 Data Protection Policy Statement

Bayport is committed to protecting the personal data and privacy of individuals and approves this Policy as the foundation for responsible personal data processing across its operations. Bayport recognises its responsibility to safeguard personal data entrusted to it and to respect the privacy rights of customers, employees, business partners, website visitors and other relevant individuals.

All employees, management, authorised representatives and third parties processing personal data on behalf of Bayport must handle personal data responsibly, maintain confidentiality and comply with this Policy and applicable data protection laws. Personal data must be collected and processed for legitimate purposes, protected against unauthorised access or disclosure, and made accessible only to authorised individuals where necessary.

Bayport shall implement appropriate technical and organisational measures to protect personal data throughout its lifecycle. It shall ensure that personal data is collected for specified purposes, processed lawfully, retained only for as long as necessary and securely disposed of when no longer required, subject to applicable legal obligations. Bayport shall also provide appropriate information to individuals about its data processing activities, facilitate the exercise of their data protection rights and address data protection concerns in accordance with applicable legal and regulatory requirements.

3 Data Protection Principles

Bayport shall apply the following principles when processing personal data.

3.1 Lawfulness, Fairness and Transparency

Personal data should be processed on a lawful basis, in a fair manner and with appropriate information provided to individuals about how their data is used.

3.2 Purpose Limitation

Personal data should be collected for specific, explicit and legitimate purposes. It should not be used for unrelated purposes unless such use is permitted by applicable law.

3.3 Data Minimisation

Bayport should collect and process only the personal data necessary for the intended purpose. Unnecessary information should not be requested or retained.

3.4 Accuracy

Reasonable steps should be taken to ensure that personal data is accurate, complete and up to date where necessary. Inaccurate information should be corrected or addressed appropriately.

3.5 Storage Limitation

Personal data should not be retained for longer than necessary to fulfil the purpose for which it was collected, subject to applicable legal, regulatory and contractual retention requirements.

3.6 Integrity and Confidentiality

Personal data should be protected against unauthorised access, disclosure, alteration, loss or destruction through appropriate technical and organisational safeguards.

Access to personal data should be restricted to authorised individuals who require it for legitimate purposes.

3.7 Accountability

Bayport should maintain appropriate measures to demonstrate that personal data is handled in accordance with this Policy and applicable legal requirements. These measures should be reviewed and improved as necessary.

3.8 Data Subject Rights

Bayport should respect the rights of individuals regarding their personal data, subject to applicable law. Requests for access, correction, deletion, objection or other applicable rights should be assessed and addressed within the legally required timeframes.

3.9 Secure Sharing and Disclosure

Personal data should be shared with third parties only where necessary and legally permitted. Appropriate safeguards should be applied to protect the information and ensure that recipients handle it responsibly.

3.10 Personal Data Breach Management

Suspected or confirmed personal data breaches should be reported through the Organisation's designated channels, assessed promptly and managed in accordance with applicable legal and regulatory requirements.

3.11 Cookies and Website Privacy

Where Bayport uses cookies or similar technologies, it should provide appropriate information about their purpose and use. Any consent required for non-essential cookies or other tracking technologies should be obtained in accordance with applicable requirements.

3.12 International Transfers

Where personal data is transferred outside Ghana, Bayport should ensure that the transfer is lawful and that appropriate safeguards are implemented where required.

4 DATA PROTECTION ENQUIRIES AND COMPLAINTS

Individuals who have questions about this Policy, wish to exercise their data protection rights or have concerns about how their personal data is handled may contact Bayport using the details below.

Organisation Name: Bayport Ghana Savings and Loans

Email Address: info@bayportghana.com

Designated Data Protection Contact: Murtala Alhassan, +233 24 499 8315

Bayport shall review and address requests and complaints in accordance with applicable legal requirements.

Individuals may also contact the Data Protection Commission of Ghana through its official website at https://dataprotection.org.gh/ for information about their rights or the process for lodging a complaint.

5 Disciplinary Statement

Non-compliance with this policy could significantly affect the efficient operation of Bayport and may result in financial loss and an inability to provide necessary services to our customers. If any user is found to have breached this policy, they will be subject to the disciplinary procedure. In addition, if a criminal offence is considered to have been committed further action may be taken to assist in the prosecution of the offender(s).

6 Exceptions

Exceptions to this policy shall be governed by the following Principles:

a. **Justification**: should be supported by a valid business or operational justification.

b. **Necessity:** should only be granted where compliance with the Policy is impractical or would adversely affect legitimate business requirements.

c. **Risk-based assessment**: The information security risks associated with the exception should be assessed and appropriate controls identified before approval

d. **Limited Scope and duration**: should be limited to the specific requirement, system, activity or users concerned and should have a defined validity period.

e. **Approval and Accountability**: should be approved by the designated authority, with clear ownership and accountability for managing the associated risks.

f. **Consistency and Fairness**- should be considered and applied consistently across the Organization based on established criteria

Policy Amendments and Revision

This policy can be changed, modified, revised or rescinded completely by the company at any time with appropriate approvals.

This document will be reviewed at least once every year to ensure continual improvement of the ISMS; however, anytime there is a change in scope, regardless of the maintenance time, the document needs to be reviewed

BAYPORT SAVINGS AND LOANS PLC

(Company Registration No: PL000022016)

Extract from the Minutes of the Board Meeting held on Thursday, 28th May 2026 at the Labadi Beach Hotel, La Road, Accra

It is hereby resolved:

APPROVAL OF POLICIES

The Board, on recommendation by the Risk and Compliance Committee approved the following policies for implementation by Management:

i. Allowances, Benefits and Compensation Policy- review
ii. Equal Opportunity Policy - review
iii. Agency Management Policy - review
iv. Tax Risk Management Policy - review
v. Risk Acceptance Policy - review
vi. ISO Policies and Procedures

DEHANDS SERVICES LTD

FRANCIS ESEM WOOD
(CHAIRMAN)

DEHANDS SERVICES LTD
(COMPANY SECRETARY)