

# Privacy Notice

## Overview

At Ghana International Bank plc (referred to in this policy as **GHIB, our, we, us** and the **Bank**), we take our data protection obligations seriously and it is important to us that you understand how, when and why we may use your personal data.

This Privacy Notice sets out in detail the purposes for which we process your personal data, who we share it with and what rights you have in relation to that data and covers:

- The personal data we collect and hold about you
- What we use your personal data for and the legal basis for doing so
- With whom your personal data may be shared by GHIB
- How we keep your personal data safe
- How long we keep your personal data
- Your personal data rights

## Contacting us

**GHIB** is registered as a “data controller” with both the Information Commissioner’s Office (**ICO**) under registration number Z6309747; and Ghanaian Data Protection Commission (**DPC**) under registration number DC17100001284G. As the data controller for your personal data, **GHIB** is responsible for deciding how we use your personal data.

For more information regarding your personal data that **GHIB** collects including your rights in connection with that data, or for any questions about this Privacy Notice, please contact:

The Data Protection Officer  
Ghana International Bank plc  
67 Cheapside, London  
EC2V 6AZ, UK  
Telephone: +44 207 653 0393  
Email: GHIBDPO@ghanabank.co.uk

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

## Complaints

We are committed to working with you to resolve any complaint or concern about privacy. If you are unhappy with the way we have dealt with your complaint or concern, you have the right to lodge a complaint with a relevant supervisory authority as follows:

- The Information Commissioner's Office (ICO), the UK supervisory authority for data protection  
Visit the ICO's website for further information: <https://ico.org.uk/>
- Ghana Data Protection commission (DPC), the Ghanaian regulatory authority on data protection  
Visit the DPC's website for further information: <https://dataprotection.org.gh/>

### 1. The personal data we collect and hold about you

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity of the person has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which will often come directly from you. This data includes:

- Your personal details (e.g., your name, date of birth, marital status, gender, nationality and other passport information or other identification information).
- Your contact details (e.g., your postal address, phone number, email address or mobile number).
- Details of transactions (e.g., payments you make and receive).
- Financial information (e.g., your bank account number, debit card number, financial history, source of funds, tax residence status).
- Details about your health and lifestyles to meet our applicable regulatory obligations and internal policy standards and procedures e.g., under our Vulnerable Persons procedures.
- Information about criminal convictions and offences (e.g., when you open an account with us).
- Technical data including internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, cookies and other technology on the devices you use to access our website (e.g. for online banking services).
- Other personal information such as career history, public positions held, family details etc.

We may collect personal data about you from various other sources, for example: credit references agencies, fraud prevention checks, criminal record checks, bankruptcy records, employers, people appointed to act on your behalf, other banks, and financial institutions and from publicly available sources such as the media.

## 2. What we use your personal data for and the legal basis for doing so

By law, we may only collect and use your personal data, if we have a “legal basis” to process your personal data. Usually, the legal basis will be one of the following:

- Where it is necessary to enter or perform our agreement with you or a corporate customer or a business supplier with which you are connected e.g., when we need information identifying you to open and administer an account for you or your firm.
- Where we need to comply with a legal obligation e.g., where we are obliged to verify your identity to comply with anti-money laundering regulations.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests, e.g., when we carry out checks for fraud, money laundering and crime prevention purposes or when we contact you for marketing purposes.
- Where we have your express permission to use your information – we may ask you for permission to collect and use certain types of personal data when required to do so by law e.g., when we propose to process special category data (such as information about your health, criminal convictions or political persuasion); or place cookies on your browser or device.

Where we ask for your permission to process your personal data, you may withdraw your permission at any time by contacting our Data Protection Officer (DPO) at [GHIBDPO@ghanabank.co.uk](mailto:GHIBDPO@ghanabank.co.uk); or through the cookie policy on our website <https://www.ghanabank.co.uk>. Note that if you withdraw your permission, we may not be able to provide or continue to provide services to you.

- Where it is in the substantial public interest e.g., to support you if you are or become a vulnerable customer

The table below sets typical reasons for using your personal data and the legal bases for doing so:

Purpose	Personal Data used	Legal bases
<b>To make decisions about whether to enter a contract with you</b>	<ul style="list-style-type: none"> <li>• Information identifying you (including personal contact details and identity documents)</li> <li>• Source of funds and bank account information</li> <li>• Results of enquiries and searches at licensed credit reference and/or fraud prevention agencies</li> </ul>	Where necessary to carry out our agreement or to take steps to enter into an agreement with you
<b>To make decisions about whether to enter a contract with a business with which you are connected</b>	<ul style="list-style-type: none"> <li>• Information identifying you (including personal contact details and identity documents)</li> <li>• Results of enquiries and searches at licensed credit reference and/or fraud prevention agencies</li> </ul>	It is in our legitimate interests to conduct checks on key individuals within the business to determine whether to enter a contract with the business.
<b>For business management and planning purposes, and accounting and auditing purposes</b>	<ul style="list-style-type: none"> <li>• Details of your financial transactions and account balances</li> </ul>	It is in our legitimate interests to use your personal data to assist us with business planning and to conduct audits and for accounting purposes

<p><b>To check your instructions to us, to analyze, assess and improve our services and for training and quality purposes, we may monitor or record communications between you and us including telephone calls.</b></p>	<ul style="list-style-type: none"> <li>Information about your identity including voice recordings,</li> </ul>	<p>Where the law requires this</p> <p>It is in our legitimate interests to develop and improve our systems, train our staff and provide our customers with the high standard of service</p>
<p><b>For marketing purposes</b></p>	<ul style="list-style-type: none"> <li>Information identifying you (including personal contact details)</li> <li>Details of your financial transactions and account balances (where you are an individual retail or other individual customer)</li> </ul>	<p>It is in our legitimate interests to contact you about products and services that we think you might be interested in</p>
<p><b>To carry out checks for the purpose of keeping your money and personal data secure, detecting and preventing fraud and money laundering and to check your identity before we provide services to you</b></p>	<ul style="list-style-type: none"> <li>Information identifying you (including personal contact details)</li> <li>Details of your financial transactions and account balances (where you are an individual retail or other individual customer)</li> </ul>	<p>Where necessary to carry out our agreement or to take steps to enter into an agreement with you</p> <p>Where the law requires this</p> <p>It is in our legitimate interests to detect, prevent and investigate fraud, money laundering and other crimes and to verify your identity to protect our bank.</p>
<p><b>To recover debt and exercise other rights we may have under any agreement with you and the preservations of any such rights including those arising by virtue of the law</b></p>	<ul style="list-style-type: none"> <li>Information identifying you (including personal contact details)</li> <li>Details of your financial transactions and account balances (including where you are an individual retail or other individual customer)</li> </ul>	<p>Where necessary to carry out our agreement or to take steps to enter into an agreement with you</p> <p>Where the law requires this</p> <p>It is in our legitimate interests to process your personal data where this is necessary to defend a legal claim or take legal action to protect our position</p>
<p><b>To manage complaints, respond to matters and take action to remedy these if appropriate</b></p>	<ul style="list-style-type: none"> <li>Information identifying you (including personal contact details)</li> <li>Details of your financial transactions and account balances (including where you are an individual retail or other individual customer)</li> </ul>	<p>It is in our legitimate interests to process your personal data where this is necessary to ensure complaints are properly investigated, a high standard of customer services is maintained and if we can prevent complaints from arising in the future.</p>
<p><b>To make/receive payments and administer an account (including where you are an individual retail or other individual customer)</b></p>	<ul style="list-style-type: none"> <li>Bank account information</li> <li>Details of your financial transactions and account balances</li> <li>Information identifying you (including personal contact details and identity documents)</li> </ul>	<p>Where necessary to carry out our agreement or to take steps to enter into an agreement with you</p>
<p><b>To prevent and detect fraud, money laundering and other crimes e.g. via use of CCTV in or around our offices to monitor and collect images or voice recordings or both</b></p>	<ul style="list-style-type: none"> <li>Information identifying you including images and voice recordings</li> </ul>	<p>Where the law requires this</p> <p>Where it is in our legitimate interests to detect, prevent and investigate fraud, money laundering and other crimes and to verify your identity to protect our Bank and comply with the law. We will also record calls to the Bank for training and monitoring purposes.</p>

<b>Sensitive personal data may be used to carry out due diligence checks which may reveal political opinions or your status as a Politically Exposed Person (PEP) or information regarding your criminal convictions or offences, if any</b>	<ul style="list-style-type: none"> <li>Your ethnicity, health related information, criminal convictions and offences political opinions about you and your family members</li> </ul>	It is in the wider public interest and in certain circumstances we will also do this with your explicit consent
<b>Sensitive personal data may be used to settle complaints, help to manage or personalize our services to you</b>	<ul style="list-style-type: none"> <li>Health related information</li> </ul>	It is in the wider public interest  We have your explicit permission to do so

### 3. With whom will we share your personal data

We will keep your personal data confidential, but we may share it with third parties (who must also keep it secure and confidential). We may share your personal data in the following circumstances:

Who we share your personal data with and why
<b>Contractors (and their sub-contractors) who provide a service to us or are acting as our agents, on the understanding that they will keep the personal data and other confidential information about you confidential and secure. This will include our payment processing service provider that help us to process your payments as well as other financial institutions that are members of the payment scheme e.g. Visa. We may also share your personal data with our other suppliers who provide us with IT systems and support services, auditors, lawyers and companies that facilitate our operations and enable our compliance with law and regulation</b>
<b>Credit reference and/or fraud prevention agencies to help make decisions during an application for our products and services and on an ongoing basis. This information will be used to decide whether to continue to make products and services available to you. Our enquiries or searches (and the results of each of them) may be recorded and such agencies may supply us with financial information about you and or pass this information to other organizations for use in making decisions about you, or to detect or prevent fraud. Information share with credit reference agencies may affect your ability to obtain credit.</b>
<b>If you are connected to a corporate customer, we may share your information with your employer, with other corporate customers part of the same corporate group, with trading platforms</b>
<b>Any person to (or through) whom we may assign or transfer, or with whom we may enter any arrangement (such as a sub-participation) by reference to, the rights obligations and/or payments under any agreement or document (including without limitation any loan facility, instrument or transaction) which you, or any corporate customer with which you are connected, has/have entered with us</b>
<b>UK and overseas regulators, law enforcement agencies and authorities in connection with their duties including crime prevention.</b>

### 4. How we keep your personal data safe

At **GHIB**, we are committed to protecting the information we collect and consequently have various technical and organizational measures in place to keep your personal data secure. These include but not limited to firewalls, mobile device management, access control procedures, anti-malware, anti-phishing, web-security (SSL encryption) and back-up measures and data protection/information security training for our staff.

### 5. How long we keep your personal data

Generally we will keep your personal data for the duration of our relationship with you and for a period of 6 years after our relationship ends. However, where we have statutory or regulatory obligations to keep personal data for longer or where we may need your information for a longer period e.g. in case of a legal claim, then the Bank's retention period of your data may be longer as set out in our Record Retention Policy and Procedures.

We also take measures to delete your personal information or keep it in a form that does not permit identifying you (Re-identification) when this information is no longer necessary for the purposes for which we process it. When determining the retention period, we consider certain criteria including

mandatory retention periods provided by law and the statute of limitations, the impact on the services we provide to you if we delete some information from or about you as well as the type of engagement we had.

## 6. Your personal data rights

By law, you have several rights in relation to your personal data, these include the right to ask us:

- about the personal data we hold about you and how we process this (**Right to be Informed**).
- for a copy of the personal data that we hold (**Right of Access**). This may be requested directly by you or a 3<sup>rd</sup> party on your behalf in a commonly used electronic format (**Right of Data Portability**).
- to correct personal data that we hold about you (**Right to Rectification**).
- to restrict the way we are processing your personal data (**Right to Restrict Processing**).
- to delete your personal data (**Right to Erasure (to be forgotten)**).
- to stop processing your personal data if you object to the ways in which we are using your data (**Right to Object**)

### *Automated Decision making*

From time to time, we may make decisions about you which are based on automated methods using software to evaluate your personal circumstances e.g., anti-money laundering and sanctions checks, politically exposed person (PEP) screening and, identity and address checks (together “automated decision making”). **GHIB** only makes automated decisions about you, where necessary to carry out our agreement or to take steps to enter into an agreement with you; or such decision making is required or authorized by law; or where you have consented to an automated decision.

You can contact us to review or challenge such a decision at [GHIBDPO@ghanabank.co.uk](mailto:GHIBDPO@ghanabank.co.uk).

If you wish to exercise any of your rights or find out more about these or any other privacy matter or concern, please contact our Data Protection Officer at [GHIBDPO@ghanabank.co.uk](mailto:GHIBDPO@ghanabank.co.uk).

**Please note that our website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy policy or notice of every website you visit.**

From time to time, we may change the way we use your personal data. Where we believe you may not reasonably expect such a change, we will update this Privacy Notice accordingly.

This Privacy Notice was last updated on 25 January 2023