

SMARTCASH PAYMENT SERVICE BANK LIMITED

PRIVACY NOTICE

1. Introduction

Smartcash Payment Service Bank Limited is licensed by the Central Bank of Nigeria as a Payment Service Bank to provide electronic payment services including financial services to customers in Nigeria. Our Privacy Notice informs you as our customer, agent, supplier, partner or visitor of (i) who we are (ii) the personal data we collect about you (iii) the reason for collecting the data and (iv) how we use the information. In this regard, this Privacy Notice relates to the handling of your personal data as we are committed to protecting and safeguarding your privacy and interests. The term “personal data” in this Notice means any information relating to an identified or identifiable individual.

2. Who Smartcash is

Smartcash Payment Service Bank Limited ('Smartcash') or ('We') is a controller of your personal data and responsible for the processing of your data.

3. Personal Data Collected

The personal data listed below is generally required to facilitate provision of Financial services to our customers and can be collected either in person, over the phone, by email, or via our website.

We collect, use, store and transfer different types of personal data including but not limited to:

- identity data including name; date of birth; National ID/Passport/service card/alien card number; signature for customers;
- contact data including telephone number; email address; nationality; gender; photo ID; postal address; physical address for customers;
- financial data including Bank Verification Number, bank account details for agents, partners, and suppliers;
- transaction data when using mobile money services; technical data, email data, profile data, usage data, cookie data marketing and communication data.
- financial and transactional information such as your money transfers, payments, deposits and the source/destination of funds for each, information about how you use of our Services, bank and credit information, and employer information;

- name and contact information relating to recipients to whom you send or from whom you request or receive money or with whom you otherwise choose to transact when using Smartcash Financial Services.
- while visiting our premises visitors will be required to provide their name, ID/passport number; and telephone number;
- while visiting our Website, the server used by Web Host will record the following: Your IP Address; the date and time of your visit; the type of Internet Browser used; the URL of any website that you were directed from; and the personal information from your computer when you browse this site will be collected voluntarily.

4. Use of Personal Data

We generally use your personal data to facilitate the provision of Financial services to you and more specifically for the following reasons (this list is not completely exhaustive):

- to contact you with information relevant to the Services that you use or the loyalty programs that you participate in or may want to participate in, to answer questions or respond to other requests that you send to our customer service teams;
- to communicate some information with you i.e., responding to any of your queries, or alerts;
- to send you marketing or promotional messages, newsletters when you have consented/ opted in (you may contact us to opt out of receiving marketing messages);
- to process payments or billing of products or services;
- to allow for the purchase and use of mobile money services;
- to improve internal operations such as managing and use of products and service offerings;
- to comply with any legal or regulatory requirement or for use by our lawyers in connection with any legal proceedings;
- for due diligence, identity verification, credit checks, fraud prevention, security purpose and debt recovery purposes;
- for purposes of making payments to suppliers, partners or agents;
- for research, statistical, survey and other scientific or business purposes.

5. Retention of Personal Data

Your Personal Data will be kept as long as is necessary to fulfill the purpose for which it was collected; for purposes of meeting legal and regulatory requirements or instituting or defending a legal claim.

6. Sharing of Personal Data

Due to the mutual trust with our customers, Smartcash will maintain at all times the privacy and confidentiality of all personal data collected. Such data may only be disclosed when required by law or when in good faith we believe that such action is necessary or desirable to comply with the law, protect or defend the rights or property of Smartcash

Smartcash may also share your personal data with law enforcement agencies; government agencies; and judicial courts in accordance with the law. For purpose of providing our services, we may share your personal data with third-party service companies or individuals which include our subsidiaries; agents; partners; and debt collecting companies. The third-party service companies or individuals are contractually bound not to disclose the personal data to any third party and to process your personal data using all appropriate safeguards

7. Cross-Border Transfer of Personal Data

We may also transfer your personal data to third parties that are located in countries outside Nigeria, as permitted or required by applicable law, regulatory authorities, law enforcement, and government agencies. This may be required (i) to provide our Services to you; (ii) to fulfil a legitimate business purpose where such purpose does not outweigh your rights and freedoms as a data subject or (iii) for legal and compliance obligations which apply to our Services.

Additionally, when you send or receive money to or from another country, we will also be required to share some of your personal data with that country as required or permitted by law. We may also transfer certain personal data about you to our data centers located outside of the country and process it to fulfil our legal obligations which apply to our Services. By using our services, you acknowledge that such transfers of personal information outside of your country of residence may occur.

8. Privacy Policy

You can access the Smartcash Data Protection and Privacy Policy by clicking on this link [Data Protection and Privacy Policy](#).

9. Cookies

We may store some of your data using "cookies" i.e a small text file that can be stored on and accessed from your device when you visit one of our websites. This enables us to recognize you when you visit our websites. The use of cookies allows us to identify you, track your preferences and the use of our websites. Our website may contain links to other websites. Smartcash will not be responsible for contents of other websites including their data collection practices and privacy policies.

10. Legal Rights

You have rights that are provided for in the Nigeria Data Protection Act 2023 and regulations regarding your personal data. You have a right to lodge a complaint with us regarding these rights or contact the Office of the Nigeria Data Protection Commission, regarding your legal rights or data privacy queries.

11. Contents

All contents published on our website reflect the latest available information. There is a possibility that some of the content may be outdated and this is not due to negligence, but is out of our control. Only formal documents are considered to be official and reflect all company changes. The company is not to be held liable in respect to the content on this site if used in sole discretion. We have full rights to change content without prior notice.

12. Queries

In the event you have further queries to your personal data, please contact the Data Protection Officer at:

Data Protection Officer

Smartcash Payment Service Bank

Plot 1968A Oyinjolayemi Victoria Island , Lagos, Nigeria

Dataprotectionofficer@smartcashpsb.ng