

## PRIVACY POLICY OF THE NIGERIA MORTGAGE REFINANCE COMPANY PLC

Please read this Privacy Policy carefully as it describes how we collect, use, disclose, retain and protect your personal information. We are committed to protecting and respecting your privacy and handling your information in an open and transparent manner. This Privacy Policy applies to any website or portal which references this Privacy Policy. Where you provide us with your personal information in any of the ways described below, you agree that we may collect, store and use it: (a) in order to perform our responsibilities to you; (b) based on our legitimate interests for processing data; or (c) based on your consent, which you may withdraw at any time, as described in this Privacy Policy.

We ensure that we comply with all applicable data protection laws when handling your information. Your personal data will be processed in accordance with the National Information Technology Development Agency rules for data protection and processing.

### 1. WHO WE ARE AND WHAT DATA DO WE COLLECT?

This Privacy Policy applies to the Nigeria Mortgage Refinance Company PLC (“**NMRC**”) websites, mobile applications, social media, and other portals offered by NMRC, a private sector-driven mortgage liquidity finance facility established for the public purpose of promoting home ownership for Nigerians while deepening the primary and secondary mortgage markets.

NMRC may collect, use, store and transfer different kinds of personal data about you which we have grouped as follows:

- Identity Data: includes first name, last name, title, username or similar identifier, marital status, title, date of birth, and gender.
- Contact Data: includes e-mail address, telephone numbers and social media handles.
- Technical data: includes internet protocol (IP) address, device identification number and type, your login data, browser type and version, your browsing history and your web log information, statistics on your page views, traffic to and from the sites, referral URL, ad data, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access this website.
- Profile Data: includes your username and password, your interests, preferences, feedback and survey responses.
- Usage Data: includes information about how you use our website, products and services.
- Markets and Communications Data includes your preferences in receiving marketing communication from us and our third parties and your communication preferences.

### 2. HOW DO WE COLLECT INFORMATION?

We collect personal information from different sources. Most of the data we collect will come from you, for example when you:

- enquire about our activities, our services, or ask us a question;
- provide your contact details to us when registering to use or accessing any websites or portals we make available or when you update those details;
- request marketing material to be sent to you;
- e-mail or get in contact with us in some way;
- voluntarily complete a customer survey or provide feedback on any of our message boards or via email or participate in any other interactive areas that appear on our website or portals;
- use or view our website via your browser's cookies;

- interact with us using social media;
- contact us offline, for example by telephone, SMS, e-mail, post or any other means of communication;
- partially complete and/or abandon any information inputted into our website and/or other online forms and may use this information to contact you to remind you to complete any outstanding information.

In addition, as you interact with our website, we will automatically collect technical data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs, and other similar technologies.

### **3. WHY WE COLLECT INFORMATION**

To the extent permissible under applicable law, we use your information to:

- provide any information and services that you have requested;
- compare information for accuracy and to verify it with third parties;
- provide, maintain, protect and improve any information and services that you have requested from us;
- manage and administer your use of the services you have asked us to provide;
- manage our relationship with you (for example, customer services and support activities);
- monitor, measure, improve and protect our content, websites/ portals and provide an enhanced, personal, user experience for you;
- undertake internal testing of our website, systems and portals to test and improve their security, provision and performance, in which case, we would pseudonymise any information used for such purposes, and ensure it's only displayed at aggregated levels which will not be linked back to you or any living individual;
- provide you with any information that we are required to send to you to comply with our regulatory or legal obligations;
- contact you to see if you would like to take part in our activities (for example, feedback on your use of our website and portal);
- monitor and carry out statistical analysis, provided that in such circumstances it is on an aggregated basis which will not be linked back to you or any living individual;
- deliver targeted advertising or information to you which may be useful to you, based on your use of our website or portal;
- deliver joint content and services with third parties with whom you have a separate relationship (for example, social media providers); and
- provide you with location-based services (for example, advertising and other personalised content), where we collect geo-location data.
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Our websites, portals (including mobile applications) and services may contain technology that enables us to:

- check specific information from your device or systems directly relevant to your use of the websites or portals against our records to make sure the websites, applications or services are being used in accordance with our end-user agreements and to troubleshoot any problems;
- obtain information relating to any technical errors or other issues with our website or portal;
- collect information about how you use the functions of the features of our website and portal;
- carry out research and development to improve our services and applications; and
- gather statistical information about the operating system and environment from which you access our applications or services.

You can manage your privacy settings within your browser or our applications and services (where applicable).

We may monitor and record our communications with you, including e-mails and phone conversations. The information we collect may then be used for training purposes, quality assurance, to record details about our websites and portals you request from us or ask us about, and in order to meet our legal and regulatory obligations generally.

#### **4. WHAT CONSTITUTES CONSENT**

Where you provide us with your personal information in the manner described in this Privacy Policy, you consent that your personal data may be collected, processed and disclosed, as described in this Privacy Policy.

#### **5. DISCLOSURES OF YOUR PERSONAL INFORMATION**

We may share your personal information with the persons set out below:

- our service providers and agents (including their sub-contractors) or third parties which process information on our behalf (e.g. internet service and platform providers, and those organisations we engage to help us send communications to you) so that they may help us to provide you with the applications, services and information you have requested or which we believe is of interest to you;
- third parties where you have a relationship with that third party and you have consented to us sending information (for example social media sites or other third party application providers);
- any governmental or regulatory authority or agency or third party as required to by law, any regulatory guideline or the valid order of a court of competent jurisdiction;

We may share non-personally identifiable information about the use of our website or portal publicly or with third parties, but this will not include information that can be used to identify you.

#### **6. YOUR LEGAL RIGHTS AND REMEDIES**

Under certain circumstances you have the following rights under our data protection laws:

- the right to be told how we use your information and obtain access to your information;
- the right to have your information rectified or erased or place restrictions on processing your information;
- where the processing of your information is based on your consent, the right to withdraw that consent subject to legal or contractual restrictions; and
- the right to lodge a complaint with the supervisory authority responsible for data protection matters.

#### **7. NO FEE USUALLY REQUIRED**

You will not have to pay a fee to access data inputted into the system (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we could refuse to comply with your request in these circumstances.

#### **8. TIME LIMIT TO RESPOND**

We try to respond to all legitimate requests within one month. Occasionally it could take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

## **9. CHANGES TO OUR PRIVACY POLICY**

We keep our Privacy Policy under regular review. Therefore, please try to read it when you visit the website (the 'last updated' reference tells you when we last updated this Privacy Policy).

## **10. DATA SECURITY AND DATA RETENTION**

We will keep your information secure by taking appropriate technical and organisational measures against its unauthorised or unlawful processing and against its accidental loss, destruction or damage. We will do our best to protect your personal information, but we cannot guarantee the security of your information which is transmitted to our website/portal or to other websites/portals via an internet or similar connection. If we have given you (or you have chosen) a password to access certain areas of our websites or portal, please keep this password safe. We will not share this password with anyone.

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

## **11. OTHER SITES AND SOCIAL MEDIA**

If you follow a link from our website or portal to another site or service, this Privacy Policy will no longer apply. We are not responsible for the information handling practices of third-party sites or services and we encourage you to read the privacy policies appearing on those sites or services.