



We Value Your Privacy

At Champion Finance Bank Plc we treat your personal information as private and confidential. We are dedicated to protecting your privacy and providing you with the highest level of security at any point of interaction with us. This Privacy Policy describes what personal information we collect, what we do with it and how we protect it.

This policy (together with our Terms and Conditions) sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it. By continuing to visit our website (www.starlightcreditunion.com) and other Champion Finance Bank customer touchpoints, you accept and consent to the practices described in this policy.

Information We Collect and Use

- We collect information about you from a variety of sources, such as: website visits, applications, identification documents, curriculum vitae, personal financial statements, interactions with relationship managers, and other third parties (credit bureaus, payment gateways, other financial institutions...) and other written or electronic communication reflecting information such as your name, address, passport details, identification numbers, biometric information, telephone number, occupation, assets, income and any other information we deem necessary.
- We may use your transactional account history including your account balance, payment records, and debit/credit card usage. We may also use information received from third parties such as family, solicitors, friends or employers, website/ social media pages made public by you, government agencies, regulators, supervisory or credit agencies.
- We may also collect other information such as video footages of you whenever you step into any of our branches, telephone conversations when you call any of our contact centre lines, geographic information of any of our branch ATMs when you use our ATMs.

Non- Personal Information Collected By Us

In order to achieve our goal of providing you with the best banking service, we sometimes collect certain information during your visits to perform certain tasks such as grant you access to some parts of our web site or conduct research on your behaviour on our site in order to improve our services. We will not disclose your information to any person outside our organization except as described in this Privacy Policy.



Cookies

Cookies are small text files stored on your computer or mobile devices whenever you visit a website. Cookies have many uses, such as memorizing your preferences to tailor your experiences while on our site– or to help us analyse our website traffic.

Champion Finance Bank uses cookies to improve your experience while on this site. We would like to let you know a few things about our cookies:

- Some cookies are essential to access certain areas of this site;
- We use analytics cookies to help us understand how you use our site to discover what content is most useful to you

Kindly refer to our cookie policy for more information on cookies.

Use of Your Personal Information

The collection and use of personal data by Champion Finance Bank is guided by certain principles. These principles state that personal data should

- be processed fairly, lawfully and in a transparent manner.
- be obtained for a specified and lawful purpose and shall not be processed in any manner incompatible with such purposes.
- be adequate, relevant and limited to what is necessary to fulfil the purpose of processing.
- be accurate and where necessary, up-to-date. In the event data is inaccurate, steps should be taken to rectify or erase such data.
- not be kept for longer than necessary for the purpose of processing.
- be processed in accordance with the data subject's rights
- be kept safe from unauthorised processing, and accidental loss, damage or destruction using adequate technical and organizational measures.

Any personal information provided by you to Champion Finance Bank will be used with your consent, or under the following underlisted instances:

- Cases where processing of personal data is required for the fulfilment of a contractual obligation.
- Cases where processing of personal data is required for compliance with legal and/or regulatory requirements.
- Cases where processing is required to protect your vital interest or that of any other natural person.
- Cases where processing is required for an activity to be carried in significant public interest.
- Cases where processing is required for legitimate interests of Champion Finance Bank or a



third party insofar as this does not conflict with the requirements for the protection of your personal data.

Your personal information is used in:

- Updating and enhancing Champion Finance Bank's records
- Executing your instructions.
- Establishing your identity and assessing applications for our products and services
- Pricing and designing our products and services
- Administering our products and services
- Managing our relationship with you
- Managing our risks
- Identifying and investigating illegal activity (i.e.), such as fraud
- Contacting you, for example in instances where we suspect fraud on your account or when the need arises to tell you about recent occurrences in the banking sector or some event(s) of significance.
- Conducting and improving our businesses and improving your experience with us
- Reviewing credit or loan eligibility.
- Preventing money laundering or terrorism financing activities.
- Complying with our legal obligations and assisting government and law enforcement agencies or regulators/supervisors
- Identifying and informing you about other products or services that we think may be of interest to you.
- Processing your job application if you apply for a job with us.

We may also collect, use and exchange your information in other ways permitted by law.

Automated Processing

We sometimes use automated systems and software to help us reach decisions about you, for example, to make credit decisions, to carry out security, fraud and money laundering checks, or to process your data when you apply for some of our products and services.

This type of processing is carried out under lawful basis and you can contact us to request that automated processing be reviewed by a human being if you detect any inaccuracies in your personal data. **Information We Share**

We may share the information about you and your dealings with us, to the extent permitted by law, with the following:

- Champion Finance Bank's Branches and Subsidiaries
- Regulators/Supervisors, Government Agencies/courts - It may be necessary by law, legal process, litigation, and/or requests from public and governmental authorities within or outside your c
- Country of residence for Champion Finance Bank to disclose your personal information. We may also disclose information about you if we determine that for



purposes of national security, law enforcement, or other issues of public importance, disclosure is necessary or appropriate.;

- External Auditors;
- Champion Finance Bank's staff;
- Credit Agencies;
- Correspondent banks;
- Champion Finance Bank's strategic partners/service providers – for the purpose of improving and providing our products and services to you. Your Personal information will not be shared with third parties for their marketing purposes.

We may also disclose information about you if we determine that disclosure is reasonably necessary to enforce our terms and conditions or protect our operations or users.

Additionally, in the event of a reorganization, merger, or sale we may transfer any and all personal information we collect to the relevant third party.

Information about our customers and their usage of our website is not shared with third parties for their marketing purposes. We do not disclose any information about any user's usage of our web site except in specific cases, and we do not share information with any unaffiliated third parties for marketing purposes unless you expressly give us permission to do so.

How We Protect Your Information

We take appropriate technical and organizational measures to prevent loss, unauthorized access, misuse, modification or disclosure of information under our control. This may include the use of encryption, access controls and other forms of security to ensure that your data is protected. We require all parties including our staff and third-parties processing data on our behalf to comply with relevant policies and guidelines to ensure confidentiality and that information is protected in use, when stored and during transmission. Our security controls and processes are also regularly updated to meet and exceed industry standards. Where we have provided you (or where you have chosen) a password which grants you access to specific areas on our site, you are responsible for keeping this password confidential. We request that you do not to share your password or other authentication details (e.g. token generated codes) with anyone. Other security measures you can take that will help us protect your data can be found at

www.championfinancebank.com/securitycentre

Where We Store Your Information

All Personal Information you provide to us is stored on our secure servers as well as secure physical locations and cloud infrastructure (where applicable). The data that we collect from you may be transferred to and stored at a destination outside Nigeria or the European Economic Area ("EEA"). Whenever your information is transferred to another location, we will take all necessary steps to ensure that your data is handled securely and in accordance with this privacy policy.



How Long We Store Your Information

We retain your data for as long as is necessary for the purpose(s) that it was collected. Storage of your data is also determined by legal, regulatory, administrative or operational requirements. We only retain information that allows us comply with legal and regulatory requests for certain data, meet business and audit requirements, respond to complaints and queries, or address disputes or claims that may arise. Data which is not retained is securely destroyed when it is identified that is no longer needed for the purposes for which it was collected.

Your Rights

You have certain rights available to you, these include

- The right to access your personal information held by us. Your right of access can be exercised by sending an email to cea@championfinancebank.com
- The right to rectify inaccurate or incomplete information.
- withdraw consent for processing in cases where consent has previously been given.
- restrict or object to processing of your personal data. We might continue to process your data if there are valid legal or operational reasons You also have the right to:
- Request that your personal data be made available to you in a common electronic format and/or request that such data be sent to a third party.
- Request that your information be erased. We might continue to retain such data if there are valid legal, regulatory or operational reasons

Maintaining Accurate Information

Keeping your account information accurate and up to date is very important. You have access to your account information, which includes your contact information, account balances, transactions and similar information through various means, such as account statements, SMS Banking, Social Media Banking and Internet Banking.

If you discover any inaccuracies in your personal information, please promptly notify us, via our e-channels, branch network or Contact Centre, and provide the required documentary evidence, to enable us to implement the necessary updates or changes.