

# **Privacy Policy**

This Privacy Policy regulates how TF FINANCIAL SERVICES LIMITED (TFFSL) processes the personal information of its clients.

TFFSL is a Non-Bank Financial Institution with a license issued by the Bank of Ghana. Its Head office is situated at GNAT Heights Ridge, Accra, Ghana, and has four branches and seventeen business support centers across Ghana.

In line with the provisions of The Data Protection Act, 2012 (Act 843) and other applicable Data Privacy laws and regulations, TFFSL maintains the following privacy principles, which govern how we collect, use, record, organize, structure, store, adapt, alter, retrieve, consult, disclose, disseminate, align, combine, restrict, erase or destroy and generally manage personal data ("processing" or "process" of your Personal Data").

Personal Data under this privacy policy is as defined by the Data Protection Act, 2012 (Act 843) and the Data Protection Commission (DPC), which is the body empowered to make regulations or directives prescribing categories of sensitive personal data. Personal data refers to data on an individual who can be identified from the data or other information in the possession of, or likely to come into the possession of a data controller. Examples of personal data includes name, email address, age/date of birth, residential address, phone number, family details such as next of kin, and financial information.

Basis for collecting and processing Personal Data by TFFSL

TFFSL processes personal data relying on any of the following legal grounds:

- Where your Consent as the Data Subject has been obtained.
- Offering Financial services to the Data Subject.
- Offering employment to the Data Subject.
- Where the processing of your personal data is necessary for the performance of a contract to which you are a party.
- For compliance with a legal obligation to which the data controller is subject.
- Where it is necessary to protect the vital interests of a person in line with Data Privacy Regulations.
- Where it is necessary for the performance of a task carried out in public interest. Where it is in the legitimate interests of TFFSL (except where the interests or rights and freedoms of the data subject override those interests).



As a responsible business, TFFSL is committed to complying with the relevant applicable data protection regulations when processing your personal data.

The Data Protection Act, 2012 (Act 843) gives you certain rights regarding our use of your personal data, including the right to:

- Request access to the personal data we have collected about you to review, modify, or request deletion of your Personal Data.
- Request a copy of the Personal Data we have collected about you and correct any inaccuracies.
- Request that we cease processing your Personal Data.
- Lodge with a competent Data Protection Authority.
- Request for your personal data to be transferred to another organisation in a commonly used and machine-readable format.

Note that some Laws or Legal obligations to which TFFSL is expected to comply with may prevent us from providing access to your personal data or fully complying with your request, depending on the circumstances and the request. For example, where producing your information may reveal another person's identity.

#### What do we need?

TFFSL is a registered data "controller" and "processor" of the personal data you provide to us.

- We may collect your information from visits, applications, identification documents, curriculum vitae, personal financial statements, interactions with relationship managers, and other third parties.
- We collect and use the personal information you provide to build an accurate profile of you (e.g., Name, Address, Nationality, Email, Phone Number, ID Number, Ghana Card, and Family-Related Information).
- We use financial information such as account balance, transaction history to assess your suitability for our financial products (Loans and Investments).
- We may also use information about TFFSL products and services you currently have, have applied for, or have previously requested.
- We may also collect visual images and video footage when you visit our premises and telephone conversations when you call any of our contact center lines.
- We also collect data from prospective employees as part of our recruitment processes.



- We may also process sensitive personal information for specific and limited purposes, such as detecting and preventing financial crime or making our services accessible to customers. We will only process sensitive personal information where we have obtained your explicit consent or, where applicable, in compliance with a legal obligation or for legal proceedings/advice.
- We collect this information to ensure you transact with us seamlessly and securely.

#### What do we do with it?

We collect, store, and process your personal data as required by law to enable you to obtain financial services through us.

All the personal data that the TFFSL collects from you will be held and processed securely by our offices and/or authorized service providers (third parties), where applicable. Your data will be confidential unless required by a legal or regulatory requirement for the financial services or where there is a legal basis for the processing of your personal data.

We will take all reasonable actions to ensure that the personal data of all customers and employees are handled securely and in a controlled manner.

## How long do we keep it?

As a regulated financial institution, we will retain your personal data as may be required by regulations in Ghana, under consideration, after which it will be disposed of as required under the respective Government Laws and Banking Regulations.

Please note that regulations may require the Bank to retain your personal data for a specified period, even after the end of your banking relationship with us.

#### **Sharing of Personal Data**

Personal data may be shared with third parties and service providers to deliver our services to you in accordance with the Data Protection Act 2012 (Act 843), the General Data Protection Regulation (GDPR), and any applicable Data Protection Laws.

In addition, we may disclose your personal data:



- If we are required to do so by law or legal process.
- To law enforcement authorities or other government officials.
- When we believe disclosure is necessary or appropriate to prevent physical harm or financial loss, or in connection with an investigation of suspected or actual illegal activity.
- If disclosure is necessary to protect the vital interests of a person.
- To enforce our Terms and Conditions.
- To protect our property, services, and legal rights.
- To support auditing, compliance, and corporate governance functions; or
- To comply with any applicable laws.

## **Data Security**

Data protection at TFFSL is a top priority, and we always strive to ensure that your personal data is protected against unauthorized or accidental access. We maintain this commitment to data security by implementing appropriate physical, electronic, and managerial measures to safeguard and secure your personal data with us.

Our servers are protected behind "firewalls", and our systems are monitored to prevent unauthorized access.

Staff are trained periodically on handling, storing and preventing data breaches.

All practical steps shall be taken to ensure that personal data will not be kept for longer than necessary, and TFFSL will comply with all statutory and regulatory requirements concerning the retention of personally identifiable information.

## Remedies for personal data violations

If your personal data is violated at any time, you can contact the TFFSL Call Center on (+233) 0242437223 or through any of the media provided for complaints. Within a reasonable timeframe of TFFSL receiving a complaint, TFFSL shall notify the Individual and take the necessary steps in line with data privacy requirements to resolve the complaint.

You may also engage the supervisory authority Data Protection Commission (DPC) if you wish to complain about how TFFSL handles or has handled your personal data, or have concerns about how your complaint has been handled.



TFFSL reserves the right to review this Privacy Policy regularly and make changes at any time to reflect changes in our business and legal requirements. We will post updates on our website (https://tffinancial.com.gh).

# **Privacy Contact Information**

If you have any questions, concerns, or comments about our privacy policy, you may contact us using the information below:

• Email: <u>info@tffinancial.com.gh</u>.

• **Phone:** +233 (0) 0242437223 ,0501648419.

• **Physical Address:** Head Office at No. 30 Independence Avenue (GNAT Heights), Ridge-Accra

• **Postal Address:** P.O. Box 1756, Cantonments - Accra, Ghana.