**MOBILE APP PRIVACY POLICY**

**We Value Your Privacy**

At Parallex Bank Limited, 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 your interaction with us. This Privacy Policy describes what personal information we collect, what we do with it, and how we protect it in the context of our mobile app.

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 use our mobile app, you accept and consent to the practices described in this policy.

**Information We Collect and Use**

We gather information from various sources to provide and enhance our services:

* **Mobile App Usage Data:** We collect data about your interactions with our app, including device type, operating system, app version, and usage patterns. This helps us to understand how you use our app and improve its functionality.
* **Personal Information:** We may collect your name, address, email, phone number, identification numbers and biometric information. This data helps us to verify your identity and manage your account.
* **Transactional Data**: Information related to your account transactions, such as account balances, payment records, and debit/credit card usage, is collected to provide seamless banking services.
* **Geolocation Data:** If you enable location services, we collect your geolocation data to offer location-based services like finding the nearest ATM or branch.
* **Communications:** We retain information from your communications with us, including emails, calls, and messages within the app, to provide customer support and address your inquiries.

**Developer's Data Retention and Deletion Policy**

Data Retention Policy

We retain user data only for as long as necessary to fulfill the purposes for which it was collected, including to provide and improve our services, comply with legal obligations, resolve disputes, and enforce our agreements. Our data retention periods are based on the following criteria:

1. Legal and Regulatory Requirements: We retain data to comply with legal and regulatory obligations, including banking regulations, anti-money laundering (AML) laws, and tax laws.

2. Business Needs: We retain data as necessary to provide our services, such as maintaining user accounts, processing transactions, and providing customer support.

3. User Consent: We retain data based on user consent, such as information provided for marketing communications, until the user withdraws consent.

4. Dispute Resolution: We retain data as necessary to resolve disputes, enforce our agreements, and protect our legal rights.

Data Deletion Policy

We are committed to ensuring that user data is securely deleted when it is no longer needed. Our data deletion practices include:

1. User-Initiated Deletion: Users can request the deletion of their personal data at any time by contacting us at dataprotection@parallexbank.com. We will process such requests in accordance with applicable laws and regulations and will take steps to securely delete the requested data.

2. Secure Deletion: We use industry-standard security measures to ensure that deleted data is permanently and irreversibly removed from our systems. This includes data stored in backup and archival systems.

**Cookies and Tracking Technologies**

Our mobile app uses cookies and similar technologies for various purposes:

* **Functionality:** To remember your preferences and settings.
* **Analytics:** To analyze app usage and improve our services.
* **Security:** To ensure the security and integrity of our app and prevent fraud.

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

**Cookie Policy**

**ABOUT COOKIES**

A “**cookie**” is a small text file stored on your computer, tablet or phone when you use a mobile app or visit a website. Some cookies are deleted when you close your mobile app or browser; these are known as session cookies. Others remain on your device until they expire, or you delete them from your cache; these are persistent cookies and enable us to remember things about you as a returning visitor. To find out more about cookies, including how to see what cookies have been set and how to manage and delete them, visit **http://www.allaboutcookies.org/**. You are migrating from Parallex Bank secure site to a third-party website by clicking and opening this link. We make no representation of the security features on the site or the level of security available on the site. It is your responsibility to protect your device or system through which you access the third party’s website. Alternatively, you can search the internet for other independent information on cookies.

We use both **SESSION COOKIES** (which expire once you close your mobile app or web browser) and PERSISTENT COOKIES (which stay on your device until you delete them).

We have also grouped our cookies into the following categories to make it easier for you to understand why we need them:

a) **Functionality**: These cookies enable the technical performance of our mobile app or websites and allow us to ‘remember’ the choices you make and your preferences.

b) **Performance/Analytical**: These cookies allow us to collect certain information about how you navigate the Sites. They help us understand which parts of our mobile app or websites are interesting to you and which are not and what we can do to improve them.

**HOW WE USE COOKIES**

Cookies do not contain any information that personally identifies you, but personal information that we store about you may be linked, by us, to the information stored in and obtained from cookies. The cookies used on this mobile app or website include strictly necessary cookies for access and navigation, cookies that track usage (performance cookies) and remember your choices (functionality cookies). We may use the information we obtain from your use of our cookies for the following purposes:

• to recognize your mobile phone when you use our mobile app or computer when you use visit our website,

• to track you as you use our mobile app or navigate our website,

• to analyze the use of our mobile app - such as how many people visit us each day,

• in the administration of our mobile app.

**LEGAL GROUNDS**

The applicable legislation allows us to process personal data, so long as we have a valid ground under the law to do so.

When we process your personal data through cookies, we rely on one of the following legal grounds for processing:

• Legitimate interests: strictly necessary Cookies;

• Your consent: functional Cookies, performance Cookies, targeting Cookies and social media Cookies.

**CHANGES TO THIS COOKIE POLICY**

This Cookie Policy may be changed from time to time in the event of new applications, if our services require this or if the applicable legislation requires it.

**MORE INFORMATION**

Please do not hesitate to contact us using the contact details on our mobile app and website if you have any questions or queries regarding how we use cookies or anything else on our mobile app and website.

The objective of this policy is to communicate what cookies are, how the Bank uses cookies and the options available to customers for managing cookies when using the Bank’s mobile app and website.

**Use of Personal Information**

The personal information we collect is used to:

**- Provide Services**: Manage your account, process transactions, and offer customer support.

**- Personalize Experience**: Tailor the app content to your preferences and usage patterns.

**- Communicate:** Send you updates, security alerts, and support messages.

**- Improve Services:** Analyze app usage and feedback to enhance our services.

**- Legal Compliance:** Meet legal and regulatory requirements.

**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, as collected and for such use above, and to the extent permitted by law or by you, with the following:

* Parallex Bank’s Branches.
* 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 country of residence for Parallex 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;
* Parallex Bank’s staff;
* Credit Agencies;
* Correspondent banks;
* Parallex Bank’s strategic partners/service providers and consultants for the purpose of improving and providing our products and services to you. Your Personal information will not be shared with third parties for 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 mobile app is not shared with third parties for marketing purposes. We do not disclose any information about any user’s usage of our mobile app 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 that information is protected in use, when stored and during transmission.

Your personal information with us remains secure because:

* We use strict security measures and technologies to prevent fraud and intrusion.
* Our Security controls and processes are regularly updated to meet and exceed industry standards.
* Our employees are trained to respect the confidentiality of any personal information held by us.

Where we have provided you (or where you have chosen) a password which grants you access on our app, you are responsible for keeping this password confidential. We request that you do not share your password or other authentication details (e.g. token generated codes, Personal Identification Number (PIN) etc) with anyone.

**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) for the purposes of providing seamless services to you, including but not limited to ensuring business continuity, the data that we collect from you may be transferred to or stored in cloud locations at globally accepted vendors' data centre. Whenever your information is transferred to other locations, 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 to 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 **dataprotection@parallexbank.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. Provided that we may continue to process your data if there are valid legal, regulatory 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 may continue to retain such data if there are valid legal, regulatory or operational reasons.

**Applicability of This Privacy Policy**

Parallex Bank or the Bank refers to Parallex Bank Limited (which shall include its successors in title and assigns).

Parallex Bank Limited comprises of Parallex Bank branches **nationwide.**

**Third-Party Sites and Services**

Parallex Bank’s app may contain links to third-party websites, products and services. Our products and services may also use or offer products or services from third parties. Information collected by third parties, which may include such things as location data or contact details is governed by their privacy practices and Parallex Bank will not be liable for any breach of confidentiality or privacy of your information on such sites. We encourage you to learn about the privacy practices of those third parties.

**Social medium platforms**

Parallex Bank may interact with registered users of various social media platforms, including Facebook, Twitter, Google+, LinkedIn and Instagram. Please note that any content you post to such social media platforms (e.g. pictures, information or opinions), as well as any personal information that you otherwise make available to users (e.g. your profile) is subject to the applicable social media platform’s terms of use and privacy policies. We recommend that you review this information carefully in order to better understand your rights and obligations with regard to such content.

**Social Events**

Parallex Bank hosts a number of social events**.** Please note that there may be photos and videos taken while attending or participating in these events and by attending this event you agree to be photographed or filmed as this forms part of these events. These pictures and videos may also be posted to our social media platforms and is subject to the applicable social media platforms terms of use and privacy policy.

**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 branch network or Contact Centre, and provide the required documentary evidence, to enable us to implement the necessary updates or changes.

**Privacy of Children**

Parallex Bank’s Policy contains the following disclosure statement for children:

**"Parallex Bank respects the privacy of children. We do not knowingly collect names, email addresses or any other personally identifiable information from children. We do not knowingly market to children nor do we allow children under 18 to open online accounts."**

**Promotional Messages**

Parallex Bank may sometimes contact you with products or services that we think may be of interest to you. If you don’t want to receive such promotional materials from us, you can opt out at any time by sending an email to **ccteam@parallexbank.com**

**Privacy Policy Changes**

This policy may be revised on an ad-hoc basis to reflect the legal, regulatory and operating environment and such revised versions will automatically become applicable to you. We will post any revisions we make to our Privacy Policy on this page and such revised policy becomes effective as at the time it is posted. We will notify you when any changes to our privacy policy have been made. We also encourage you to check this page from time to time for updates to this policy.

**Contact**

Questions, comments and requests regarding this mobile app privacy policy are welcomed and should be addressed to **dataprotection@parallexbank.com.**

**To contact our Data Protection Officer, kindly address your request to “The Data Protection Officer, Parallex Bank Limited” at Plot 1261 Adeola Hopewell Street, Victoria Island, Lagos, Nigeria.**