

## **Data Protection and Privacy Policy Statement**

### **Introduction**

The document is prepared in accordance with the provisions of the Ghana Data Protection Act, 2012 (Act 843) and by extension, the EU General Data Protection Regulation (GDPR).

Societe Generale Ghana PLC (SGGH), being a Ghanaian bank and a subsidiary of the Societe Generale Group is required to comply with the most stringent requirements of the Ghana Data Protection Act, 2012 (Act 843) and the General Data Protection Regulation as much as they are not in conflict. When in conflict, Ghana Data Protection Act, 2012 (Act 843) takes precedence.

### **1. Purpose of the Policy**

At SGGH we are committed to safeguarding the privacy and security of the personal information entrusted to us by our customers; suppliers; employees, third parties and shareholders (data subjects).

For personal data of individuals, this document also highlights their rights and covers the data subject(s) whose personal data is collected and processed, in compliance with the Data Protection Act (DPA)

It also describes why and how we collect and use personal information about our data subjects), It highlights with whom we might share personal information and how long we keep it. besides, it makes data subjects aware of their rights under the regulation.

### **2. Scope of the Policy**

This policy applies to all customers, service providers, employees, third parties and shareholders who provide or receive services through SGGH. It covers all personal information collected, processed, and stored during our business operations where SGGH acts as Data controller or Data Processor.

### **3. Data Collection**

We collect and process the following categories of personal data:

- **Personal identification information** (e.g., name, date of birth, place of birth, occupation, national ID, passport number, marital status, gender, citizenship and nationality)
- **Contact information** (e.g., phone numbers, email addresses, home address, workplace, and postal addresses)

- **Financial information** (e.g., bank account details, transaction history, credit history, income and expenditure, financial position, status, and wealth declaration)
- **Employment and income data** e.g. payslip, declaration of means, wealth declaration
- **Profile and Biometric data** (e.g., for authentication purposes; username and password)
- **Transaction Data:** includes details about payments to and from you and other details of products and services you have acquired from SGGH.
- **Technical data** which includes internet protocol (IP) address, your login identity data, browser type and version, time zone setting and location, browser plug-in types and versions, IP, operating system and platform, and other technology on the devices you use to access our systems.
- **Job Application Data:** Data submitted throughout the recruitment process e.g. name, email address, educational background and any personal information you provide to SGGH as part of the **recruitment process**.
- **Marketing and Communications Data:** Information about data subject communications with the Bank and our third parties and your communication preferences. Consent given by the data subject to the Bank.
- We also collect, use and share aggregated data such as statistical or demographic data. Aggregated data could be derived from your personal data but is not considered personal data in law as this data will not directly or indirectly reveal your identity. For example, we may aggregate your usage data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect aggregated data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this Privacy Policy.

#### 4. Legal Basis for Processing Data

We process your personal data based on the following legal grounds:

- **Performance of a contract:** To provide banking and financial services as agreed upon.
- **Consent:** Where you have explicitly consented to the use of your personal data.
- **Legal obligation:** To comply with applicable laws, regulations, and regulatory requirements.
- **Legitimate interest:** For the purposes of security, fraud prevention, lawsuits and in improving our services.
- **Public Interest:** To carry out the processing that is in the public interest.

#### 5. Use of Personal Data

Where applicable, SGGH will require your explicit consent to process collected personal data.

Visitors to the Bank's website are expected to read and understand the website privacy notice and then agree to the website's terms of use. By consenting to the privacy policy, data subjects are permitting SGGH to use or process their personal data specifically for the purpose identified before collection.

We will only use your personal data for the following purposes:

- To provide and manage the banking products and services you request
- To assess your financial status and manage your banking relationship with us
- To comply with legal and regulatory obligations
- For fraud detection and prevention, including monitoring suspicious transactions
- To improve customer service and enhance your banking experience
- To communicate with you regarding products, services, or promotions (with your consent)

## **6. Use of Cookies**

The bank's website uses cookies provided by trusted third parties, such as Google Analytics, to help us understand and improve users' experience on the website.

SGGH may use the information obtained from the use of our cookies to:

- Recognize a computer when a user visits the Bank's website.
- Track whoever navigates the website
- Improve the website's usability
- Analyze the use of its website, such as how many people visit it each day, and manage the website.

Users can disable cookies and prevent the setting of cookies by adjusting the settings on their browser. However, this is not recommended, as disabling cookies may also disable certain functionality and features of the site.

## **7. Data Sharing and Disclosure**

To the extent necessary in the management of the customer relation, employee management, supplier management and in particular for risk management, incident and fraud prevention, Know Your Customer, Anti-money laundering purposes, respect of regulatory requirements, improve efficiency, enhance service quality and to leverage on Group expertise, SGGH may share the personal data of its clients and employees to other legal entities both within and outside of the Société Générale Group, as well as, to competent authorities as fiscal authorities. These recipients could be established within or outside Ghana, including countries whose data protection legislation differs from that of Ghana or the European Union legislation. These transfers take place under conditions and guarantees offering appropriate protection of your personal data.

Aside from these situations and where the bank may be required to disclose the personal data of individuals in accordance with a legal obligation in response to requests by government authorities or law courts on matters involving national security or law enforcement requirements, SGGH will not pass on its data subjects' personal data to third parties without first obtaining consent.

Disclosure of information could be required by:

- Regulatory authorities and law enforcement agencies, as required by law
- Authorized third-party service providers who help us deliver our services (e.g., IT service providers, payment processors)
- Credit reference agencies and other financial institutions for credit assessment and fraud prevention
- Any other parties with your prior consent

## 8. Data Retention

We will retain your personal data for as long as necessary to fulfill the purposes outlined in this policy in line with DPA's guidelines on the retention of records and personal data. Once your personal data is no longer required, it will be securely deleted or anonymized.

## 9. Data Security

We take appropriate technical and organizational measures to protect your personal data from unauthorized access, alteration, disclosure, or destruction. These measures include:

- Encryption of sensitive data
- Secure storage systems
- Regular security audits and monitoring
- Restricted access to personal data on a need-to-know basis
- Employee training on data protection practices

## 10. Your Rights

As a data subject, you have the following rights regarding your personal data:

- **Right to access:** You can request a copy of your personal data held by us.
- **Right to rectification:** You can request that we correct any inaccurate or incomplete data.
- **Right to erasure:** You can request the deletion of your personal data under certain conditions.
- **Right to object:** You can object to the processing of your personal data for specific purposes.

- **Right to restrict:** You can restrict processing of your personal data where certain conditions apply.
- **Right to data portability:** You can request that your personal data be transferred to another service provider.
- **Right to withdraw consent:** Where processing is based on your consent, you have the right to withdraw it at any time

## 11. International Data Transfers

If we transfer your personal data outside Ghana, we will ensure that appropriate safeguards are in place to protect your data, in compliance with applicable data protection laws.

## 13. Consequences for failure to provide accurate data.

Your failure to provide accurate and adequate data and consent may impact the Bank's ability to provide the required services for relationship management, risk management and compliance with regulatory requirements. This could have multiple consequences including inability to process your transactions, account restrictions or closure, denial of service, regulatory breaches, legal or financial repercussions.

## 14. Updates to This Policy

We may update this Data Protection and Privacy Policy from time to time to reflect changes in our practices or legal requirements. Any changes will be posted on our website and, where appropriate, notified to you.

## 15. Contact Us

If you have any questions or concerns about this Data Protection and Privacy Policy or wish to exercise your rights, please contact our Data Protection Officer (DPO) at:

**Data Protection Office**  
 Compliance Monitoring Department  
 Societe Generale Ghana  
 +233 (0) 302 208 600  
[sgghana.info@socgen.com](mailto:sgghana.info@socgen.com)

This policy is effective as of July 25, 2025.