



FIRSTBANK GHANA LIMITED

PRIVACY POLICY

At FirstBank Ghana, we put you first and are thus committed to protecting and respecting your privacy. We are committed to being transparent about how we collect, process, share and manage data about you (our customers and other natural persons where applicable).

FirstBank Ghana will only process your information when it has been received directly from you as the data controller or through our clients when we act as data processors in line with their instructions, in compliance with the Bank's obligations and your rights under Ghana's Data Protection Act, 2012 (Act 843), and other applicable data protection laws.

1. FIRSTBANK AND YOU

This Privacy Policy stipulates the Bank's approach to handling your data and your rights with regards to our collection, use, storage and sharing of your personal data which may be collected by FirstBank Ghana in the course of providing you with exceptional products and services, collectively referred to herein as FirstBank Ghana's "services", across all our delivery channels to meet your needs.

2. YOUR PERSONAL INFORMATION

In the course of consuming services provided to you by FirstBank Ghana to meet your needs, through this and other channels available, we collect information you provide us via forms, phone calls, and correspondence by mail or emails, service point interfaces, and any other channels we may make available to you from time to time.

2.1 INFORMATION WE HOLD ABOUT YOU

Information we hold about you will often come from you directly (for example, when you apply for a new product or services).

The personal data we collect may include but not limited to the following:

Personal Data Type	Description of Personal Data
Identity Data	Your personal details (for example, your name, date of birth, passport information or other identification information)
Contact Data	Your contact details (for example, your postal address, phone number, email address or mobile number)

Financial Data	Data about your Financial profile
Transaction Data	Details of transactions (for example, payments you make and receive)
Technical Data	Internet protocol (IP) address, login data, details of browser and operating system, time zone setting and location, browser plug-in types and versions, platforms and other technology such as device id, geolocation, IP, model and user agent on the devices used to access the Bank's website.
Profile Data	Data that help us identify you (e.g., Personal Identifiers, Contact Information, Account Details, Demographic Information, Preference and Interest, etc.)
Job Application Data	Any personal information you provide to FirstBank Ghana as part of the recruitment process.
Biometric Data	<p>Information related to your unique physical or behavioural traits used to verify your identity, authenticate you, and secure transactions (e.g., fingerprints, facial recognition).</p> <p>1. Why we Capture Facial Data: We use advanced facial mapping technology to capture 3D spatial orientation and facial expressions. This helps us confirm that the selfie is being taken by a live user, enhancing authentication and reducing fraud.</p> <p>2. How the Data is Stored: Facial data is processed locally on your device. It is used solely to verify liveness during authentication and is not stored or transmitted externally.</p>

	<p>3. Data Sharing and Privacy: All facial mapping data, including spatial orientation and facial expressions, is processed entirely on-device. It is not shared with any third (or first) parties</p>
Marketing and Communications Data	Information about data subject communications with the Bank. Preferences in receiving marketing e-mails and consents given by data subject to the Bank.
Others	CCTV/Video footage whenever you come into our premises or use our ATMs and telephone conversations via calls made through any of our contact centre lines.

2.2 WHY DO WE NEED THE DATA?

FirstBank Ghana ensures that the personal data collected and processed is necessary for the purpose of collection, and we shall not collect or process more data than is reasonably required for a particular processing activity. In addition, every processing purpose has at least one lawful basis for processing to safeguard the rights of the data subjects, as listed below:

Purpose of Processing	Lawful Basis of Processing
Account Management: Managing customer accounts, transactions, and providing banking services.	Performance of a contract: Processing personal data is necessary for the performance of a contract to which the data subject is a party (e.g., opening and maintaining a bank account).

<p>Fraud Prevention: Detecting, preventing, and investigating fraudulent activities to protect customers and the Bank.</p> <p>Customer Support: Addressing inquiries, resolving complaints, and providing support services to customers.</p> <p>Internal Reporting and Analysis: Generating</p>	<p>Legitimate interests: Processing personal data is necessary for the legitimate interests pursued by the bank or a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject.</p>
<p>reports, conducting analysis, and making strategic decisions based on aggregated and anonymized data.</p> <p>Business Development: Identifying market trends, developing new products or services, and improving overall business operations.</p>	
<p>Compliance with Legal Obligations: Fulfilling legal and regulatory requirements imposed on banks, such as anti-money laundering (AML) and know your customer (KYC) regulations.</p>	<p>Legal obligation: Processing personal data is necessary for compliance with a legal obligation to which the bank is subject (e.g., reporting suspicious transactions to regulatory authorities).</p>
<p>Marketing and Promotions: Providing information about products, services, and promotional offers to customers, subject to their consent and preferences.</p>	<p>Consent: Processing personal data is based on the data subject's consent, which must be freely given, specific, informed, and unambiguous. Data subjects have the right to withdraw consent at any time by sending a mail to Firstsolutions@firstbankgroup.com</p>

2.3 Sources of Personal Data

We may also use information about you collected by third parties and other service partners to better serve your needs. However, these third-party sources operate independently and are not under the control of FirstBank Ghana. While we take steps to work with trusted partners, we cannot assume responsibility or liability for how these third parties collect, use, or share your information.

3. CONSENT

We don't ask for your personal information unless we need it to provide or improve our products and services for you. We want to be sure we have your consent to collect, use and, where necessary, share

your information with our partners and suppliers that help us serve you. Whenever we introduce new services and technologies, we'll ensure you understand and agree to any new ways in which your information is handled. You will be considered to have given your consent to FirstBank Ghana for the processing of your personal data when:

- i. You complete any form, brochure or material issued by FirstBank Ghana at any of our service points (mobile, online, in-branch etc.) requesting for such personal information.
- ii. You register, check or tick the acceptance box on any of our electronic platforms (Online or Mobile) relating to terms and conditions of any service or product offered by FirstBank Ghana.
- iii. You send a request, complaint or other communication to FirstBank Ghana.
- iv. You use any service or product offered by FirstBank Ghana.

4. USE OF YOUR INFORMATION

FirstBank Ghana will process your personal information for the following purposes:

- i. To offer and provide our Products and Services tailored to meet your unique needs.
- ii. To fulfil the terms of any service contract(s) you might have with us.
- iii. To improve your service experience with us
- iv. To conduct our business
- v. To manage our relationship with you
- vi. To comply with Laws and Regulations
- vii. To provide information to Credit Agencies
- viii. To update your records
- ix. To develop statistics as may be required.
- x. To comply with our Internal Policies
- xi. To communicate with you when necessary

FirstBank Ghana will limit the collection and use of your personal information for the stated purposes.

5. COOKIES

We use cookies to optimize your user experience when you browse our website. If you register a profile with us, we will use cookies to manage the signup process and general administration and manage your browser session while you are logged in. Further details can be found in our Cookies Policy. ([FirstBankGhana-Cookies-Policy.pdf](#))

6. INFORMATION SHARING AND DISCLOSURE

FirstBank Ghana will not sell or rent your personally identifiable information to anyone. FirstBank Ghana may share or disclose your personal information to third parties where:

- i. We have your consent to share or disclose such personal information.
- ii. We are required by law to share or disclose such personal information.
- iii. We respond to subpoenas, court orders or other legal processes.
- iv. We find that your actions on our electronic platforms violate any of our Policies for the purpose of investigations, reporting and enforcing any of our rights.
- v. Required for audit purposes.

FirstBank Ghana may use and share your personal information with its trusted service providers who process data on our instructions under strict confidentiality agreements (e.g., cloud storage, payment processing)" for providing services and service-related activities such as collecting subscription fees for such services, notifying or contacting you regarding any problem with, or the expiration of such services. In this regard, the Affiliates and members of FirstBank shall process the information as provided in this Privacy Policy.

FirstBank Ghana may also disclose or share your personal information where it is necessary to enforce the terms and conditions of any of our Products and Services or any of our rights as well as to protect our operations and customers.

7. CROSS-BORDER DATA TRANSFER

Given the scale of our banking operations, we process data both inside and outside of Ghana, relying on legally mandated instruments for authorized data transmission across borders where necessary. Countries where we process data may have regulations that differ from and are possibly less protective than those in Ghana and the EU. FirstBank Ghana will ensure that the third-party meets the core regulatory standards prior to processing.

We may consider adopting the below text in lieu of the above:

We may transfer your personal data to trusted third parties, affiliates, or service providers located outside Ghana. When we do so, we ensure an adequate level of protection is guaranteed, in compliance with Act 843. This is achieved through one or more of the following safeguards:

- *Transferring to countries approved by the Data Protection Commission as having adequate data protection laws.*

- *Implementing approved data transfer agreements (e.g., Standard Contractual Clauses) that require the recipient to protect your data.*
- *Relying on other legally recognized mechanisms for which the recipient is subject to binding and enforceable obligations.*

8. PRIVACY OF CHILDREN

FirstBank does not design its websites or digital platforms with the intention of attracting or engaging children under the age of 18. The Bank's policy is not to knowingly collect, use, or retain personal information from individuals in this age group. However, in cases where it is necessary to open and manage accounts for minors, FirstBank will only do so with the explicit consent of a parent or legal guardian. This approach ensures compliance with applicable laws and regulations, including Ghana's Data Protection Act, 2012 and the Children's Act, 1998 (Act 560).

9. INFORMATION PROTECTION

FirstBank Ghana will always ensure that your personal information is adequately protected. We have put in place processes and technologies to ensure that your personal information is not modified, lost, damaged or destroyed. Our people are trained to ensure that your personal information is not disclosed and safe as stated in this policy.

Where access and use of our electronic platforms requires authentication of the user, you shall be responsible for the use and safety of your authentication credential(s) including but not limited to Username, Personal Identification Number (PIN), Password, One Time Passwords (OTP) and Tokens.

FirstBank Ghana will ensure that the personal data in our custody is secure and kept confidential as expected. We implement generally accepted technical and organizational measures to protect your personal data against unauthorized or unlawful processing, accidental loss, destruction, or damage, including encryption where appropriate.

10. RETENTION

We retain your personal data only for as long as necessary to fulfil the purposes for which it was collected, including satisfying any legal, regulatory, accounting, or reporting requirements. Our retention periods are determined based on the nature of the data, the purpose of processing, and relevant legal obligations (years post-account closure). You may request details of specific retention periods applicable to your data.

11. YOUR RIGHTS UNDER THIS POLICY

According to the provision of Ghana's Data Protection Act, 2012 (Act 843), data subjects have certain rights. The following rights are available to you under this Policy:

- a. You may at any time request access to your personal information held by FirstBank Ghana or request that your personal information be made available to a third party. Your request may specify the format in which the information should be made available subject to FirstBank Ghana having the capacity to provide the personal information in the requested format.
- b. You may request to rectify and update your personal information with FirstBank Ghana at any time.
- c. You may object and restrict the processing of your personal data by FirstBank Ghana
- d. You can request that your personal information be deleted or erased. However, we may continue to retain such personal information as may be required for compliance with legal, regulatory or policy requirements.
- e. You have the right to be fully informed about how your personal data is being collected, used, shared, and stored. This includes:
 - i. The specific purpose of processing your data
 - ii. The categories of data being collected
 - iii. The data retention period or criteria used to determine it
 - iv. Any recipients or categories of recipients to whom the data may be disclosed
 - v. Details regarding data transfers to third countries or international organizations
- f. You also have the right to seek judicial remedy or compensation for harm suffered due to unlawful data processing.

12. REMEDIES

Where you have concerns relating to the processing of your personal information by FirstBank Ghana or require any clarification on this policy, please notify us through or contact details provided below:

Email: (Firstsolutions@firstbankgroup.com)

We will respond to your concerns within 30 days of receiving your notice.

You also have the right to lodge a complaint directly with the supervisory authority, Data Protection Commission (DPC) where you suspect any misconduct or violations of the above listed rights in section.

Email: info@dataprotection.org.gh

Website: dataprotection.org.gh

13. UPDATES TO THIS PRIVACY POLICY

This Privacy Policy is Version 2.0, effective as of December 1, 2025. We may update this policy periodically. Where there are changes in the way we use your personal information we will notify you by posting a prominent notice on our website.