



Privacy Notice of Deutsche Bank, Representative Office in Nigeria

September 2024

In accordance with disclosures required by data protection law, the following information provides an overview of how **Deutsche Bank Representative Office (Nigeria) Limited** (“We”) use information We hold about individuals (this is known as “**personal data**”), such as prospect clients, authorised representatives, ultimate beneficial owners, guarantors, beneficiaries, and individual business contacts (all referred to below as “**You**”). This notice also outlines Your rights under data protection law.

1. Who is legally responsible for the handling of Your personal data and who can You contact about this subject?

In data protection law terminology, such role lies with the “controller”, namely:

Deutsche Bank Representative Office (Nigeria) Limited
4 Adeyemi Lawson Street, Ikoyi, Lagos, Nigeria
Tel: +234 1 270-7655

We are required to handle (or “**process**”) Your personal data securely and otherwise in accordance with applicable data protection laws.

Should You have queries or complaints about the way in which We process Your personal data, You may raise these with your usual Deutsche Bank contact or else with our internal Data Protection Officer via the contact details above or the following email address: dpo.mea@db.com.

2. What personal data might We hold about You and where do We source such data?

We will only hold data about You that is relevant in the context of the business relationship which We have with You. Some of this information We will obtain directly from You. We may also process personal data from a range of other sources, which may include your employer, other Deutsche Bank Group entities, other companies and financial institutions, publicly available sources (e.g. the press, registers of companies or assets, internet websites, including social media platforms like Linked-In) and from providers of business-risk screening services, such as credit reference agencies, anti-fraud databases, sanctions lists and databases of news articles.

The types of personal data that We process may include Name, address and other contact information (telephone, e-mail address).

In rare cases, and only when allowed, We might process additional personal data such as the following:

- KYC (“Know Your Customer”) records, such as passport details, social security number, date and place of birth, source of wealth, rationale for use of corporate structures, relationships with public officials, criminal record;
- Financial information, such as employment, income, pension, investments, assets, liabilities, outgoings, creditworthiness, bank account details, specimen signature, investment objectives, knowledge of financial products and services, risk appetite, capacity for loss, tax status, domicile.

3. What will We use Your data for and does the law allow this?

The purposes for which We use and process Your personal data might be as per the list summarised below, together with the specific grounds under data protection law (see the bold bullet points) which allow us to do this:

- **For the performance of a contract or to take steps prior entering in a contract**

It may be necessary for us to process Your personal data in order to take steps at Your request prior to entering into a contract with DB Group.

- **For compliance with a legal obligation or acting in the public interest**

Operating in the financial sector, We are subject to a number of statutory and regulatory obligations that may require us to collect, store or disclose personal data, such as for anti-money laundering purposes or to respond to investigations or disclosure orders from the police, regulators of DB Group entities, and tax or other public authorities (including outside Nigeria).

- **For the purposes of legitimate interests**

Where necessary, We process Your personal data to serve our legitimate interests or those of a third party (the law permits this only insofar as such interests are Deutsche Bank Representative Office (Nigeria) Limited' not outweighed by your compelling legitimate interests. Cases where We may rely on our legitimate interests to process Your personal data include (but are not limited to):

- Know-Your-customer and creditworthiness checks;
- Client and vendor relationship management;
- Business analysis and development of products and services;
- Activities relating to information security and building security, including use of CCTV recording;
- Managing the risks and optimising the efficiency of DB Group operations;
- Recording of telephone lines and monitoring of electronic communications for business and compliance purposes;
- Prevention and detection of financial crime;
- Evaluating, bringing or defending legal claims;
- Marketing of DB group products (unless You have objected/unsubscribed);
- Audits;
- Business restructurings.

- **On the basis of Your consent**

If We wish to process Your personal data in a way not covered by the legal justifications above, We would need Your consent. Where You give consent, You are entitled to withdraw it at any time. Note that withdrawing Your consent does not render our prior handling of Your personal data unlawful and that it might have an impact on our ability to continue to provide our services in the same way in future, as illustrated below.

4. Who might We share Your data with?

Where necessary to fulfil Your instructions to us and for the other purposes outlined above, We may share information about You with a range of recipients including (but not limited to) the following: credit reference agencies, background screening providers, financial institutions, funds, payment recipients, payment and settlement infrastructure providers, exchanges, regulators, courts, public authorities (including tax authorities), Deutsche Bank Group entities and service providers, professional advisors, auditors, insurers and potential purchasers of elements of our business. These recipients could be located outside Nigeria.

5. Will We transfer Your data to other countries?

Deutsche Bank and its clients are active globally and thus information relating to You may, in line with the purposes described above, be transferred outside Nigeria.

However, such transfers will only be made where permitted by the Nigerian law. If We use service providers outside Nigeria, We will require them to apply a sufficient protection to personal data.

6. How long will We keep Your data for?

In general terms, We retain Your personal data as long as necessary for the purposes for which We obtained it (see section 3 above). In making decisions about how long to retain data We take account of the following:

- The termination date of the relevant contract or business relationship;
- Any retention period required by law, regulation or internal policy;
- Any need to preserve records beyond the above periods in order to be able to deal with actual or potential audits, tax matters or legal claims.

7. Will We use Your data for marketing and/or profiling purposes?

We may use Your personal data to give You information about products and services offered by our DB Group affiliates that We think You may be interested in receiving. Where We consider it appropriate, and so far as compliant with marketing laws, We may contact You in this regard by email or telephone. We refer to Your right to object to marketing activity in the next section.

“Profiling” in the context of this notice is the use of an automated process to analyse personal data in order to assess or predict aspects of a person’s behaviour. We may use profiling in the following circumstances:

- To help identify potential cases of financial crime;
- To provide You with information on DB products and services that seem likely to be of interest;
- To assess creditworthiness (where automated credit scoring based on a mathematically and statistically recognised and proven procedure assists us with our decision making and ongoing risk management).

8. What data protection rights do You have?

Subject to certain exceptions and limitations, by law you may have the right to **request confirmation** from us that DB is storing or otherwise processing personal data related to you, and where that is the case:

- **Request the purpose** of the processing.
- **Request the categories** of the personal data concerned.
- **Request the list of recipients** or categories of recipients to whom the personal data have been or will be disclosed.
- **Request the period** for which the personal data will be stored or, if not possible, the criteria used to determine that period.
- **Request rectification or erasure** of your personal data without undue delay. This enables you to ask us to delete your personal data where there is no good reason for us continuing to process it.

- **Request the restriction** of processing of your personal data.
- **Clarification on any source** used to retrieve your personal data.
- **Request not to be subject to automated decision making.** This enables you to ask us not to make a decision about you that affects your legal position (or has some other significant effect on you) based purely on automated processing of your data. If you make such a request, we will arrange for a person to review the decision in question.
- **Request access** to your personal data. This enables you to receive a copy of the personal data we hold about you.
- **Right to portability** of your Personal Data, meaning that you have the right to receive Personal Data that you have provided to us in a structured, commonly used and machine-readable format. You also have the right to direct us to transfer this data to any other person where technically feasible.
- **Modify or withdraw any consent** you have given regarding the processing of your personal data.
- **Request rectification** of the personal data that we hold about you. This enables you to have incomplete or inaccurate data that we hold about you corrected.
- **Object to processing** of your personal data. The right to object only applies where our lawful basis for processing your data is that it is necessary in the public interest or for our (or another party's) legitimate interests. You also have the right to object to any use of your personal data for direct marketing purposes by us and to be given prior notice of disclosure of your data to third parties for direct marketing purposes (or such use of it by us on their behalf) so that you may object if you wish.

To exercise any of these rights, please write to Your usual contact at Deutsche Bank or the Data Protection Officer via the contact details given in section 1 above.

You are also entitled to submit any complaint You may have to the data protection regulator, which in Nigeria is the Nigeria Data Protection Commission (NDPC) via email at info@ndpc.gov.ng or via regular mail sent to the NDPC main office: No.12 Clement Isong Street, Asokoro, Abuja, Nigeria, Tel: +234 (0) 916 061 5551.

9. Are You under an obligation to provide us with Your personal data?

You are not required by law to provide us with Your personal data. However, if You refuse to do so We may not be able conduct further business with You. For example, in order to satisfy our anti-money laundering obligations We have to verify the identity of our clients. This inevitably requires us to collect certain personal data from current and prospective clients.

10. Changes to this privacy notice

We may update this privacy notice from time to time in order to clarify it or address changes in law or our business operations. We will notify You if We make any substantial updates and You can always access the current version at the following Website address:

[Privacy Notice \(db.com\)](#)

We may also notify You in other ways about the processing of Your personal data, such as in specific product documentation and online.