

MoMo Payment Service Bank Employee data privacy notice

Table of Contents

- 1. Employee Privacy Notice**
- 1.1 Introduction**
- 1.2 Key Definitions**
- 1.3 To Whom does this Notice Apply?.....**
- 1.4 Who We Are (MoMo PSB)?**
- 1.5 What we Do?.....**
- 1.6 What Information Do We Collect?**
- 1.6.1 Where Is It Collected from?**
- 1.6.2 Why is it Being Collected?**
- 1.6.3 Monitoring Without Notice**
- 1.7 To Whom does MoMo Disclose Employee Personal Information**
- 1.8 How does MoMo Safeguard Employee Personal Information?.....**
- 1.9 Cross-Border Data Transfers.**
- 1.10 Internal MoMo Communication.**
- 1.11 Employee Rights to Privacy**
- 1.11.1 Access to Personal Information**
- 1.11.2 Quality of Personal Information**
- 1.11.3 Access to This Notice.....**
- 1.11.4 Access to This Notice (Language).....**
- 1.11.5 In the Event of a Breach**
- 1.11.6 Contact Details**
- 1.12 Changes to this Notice**
- 1.13 Applicable Laws**
- 1.14 Date of Last Update**

1. Employee Privacy Notice

1.1 INTRODUCTION

The Employee Privacy Notice explains how MoMo PSB obtains, uses and discloses employees’ Personal Information. MoMo is committed to protecting Employee privacy and to ensure that employees’ Personal Information is collected and used properly, lawfully and transparently. This Notice incorporates our Privacy Policy available at <https://www.momopsb.com>

1.2. Key Definitions

The following key terms should be read in conjunction with this notice: Term	Definition
Consent	Use of Personal Information and Storage in accordance with this policy
Data Subject	The person (natural or juristic) to whom Personal Information relates. In this case, the Employee.
Employee	Any person who works for or provides services to or on behalf of MoMo and receives, or is entitled to receive, remuneration and any other person who assists in carrying out or conducting the business of MoMo. It includes, without limitation, directors (executive and non-executive), consultants, all permanent, temporary and part-time staff, as well as contract workers.
NITDA	National Information Technology Development Agency
Personal Information	Information relating to an identifiable, living, natural person, and where it is applicable, an identifiable, existing juristic person. Such information is further elucidated in below
Processing / Process of Personal Information	Any operation or activity or any set of operations, whether by automatic means, concerning company Personal Information, including— (a) the collection, receipt, recording, organization, collation, storage, updating or modification, retrieval, alteration, consultation or use; (b) dissemination by means of transmission, distribution or making available in any other form; or (c) merging, linking, as well as restriction, degradation, erasure or destruction of Personal Information.
Operator	A third-party who is processing company Personal Information for MoMo in terms of a contract or mandate, without coming under the direct authority of that party.
Special Personal Information	<ul style="list-style-type: none"> ▪ The religious or philosophical beliefs, race or ethnic origin, trade union membership, political persuasion, health or sex life / orientation or biometric Personal Information of a data subject, ▪ The criminal behavior of a Data Subject to the extent that such information relates to:

	<ul style="list-style-type: none"> ▪ The alleged commission by a data subject of any offence; or ▪ Any proceedings in respect of any offence allegedly committed by a data subject or the disposal of such proceedings.
--	---

1.3 TO WHOM DOES THIS NOTICE APPLY?

All prospective, existing and former employees including third party consultants and contract staff prior to, during and after employment at MoMo

1.4 WHO ARE WE (MoMo)?

- MoMo refers to MoMo Payment Service Bank, with Registration No: 999999999-9999 and principal place of business at Akin Adesola, Victoria Island, Lagos. P.M.B 80147 Adeola Odeku Post Office, Victoria Island, Lagos.

MoMo Payment Service Bank (PSB) is a fully registered limited liability company with Corporate Affairs Commission (CAC) and licensed by the Central Bank of Nigeria (CBN) to offer financial services. **MoMo** Payment Service Bank, is the financial services subsidiary of telecoms company MTN Nigeria PLC.

1.5 WHAT WE DO

Yello Digital Financial Services is a subsidiary of MTN Nigeria Africa’s largest provider of communications services, and the operator of MoMo Agent service. YDFS is a financial service provider in agency banking and super-agent operation under the CBN Super-Agent framework and agent banking guidelines to provide amongst other services, agent network to serve financial institutions and Mobile Money operators in Nigeria.

1.6 WHAT INFORMATION DO WE PROCESS?

MoMo collects Personal Information about the Employee that may be used in connection with employment, remuneration, benefits and fulfilment of an employment contract. The contract is subject to change from time to time. The information includes but is not limited to name, age, ID number, address, other contact details, academic records, performance management, income and payment records, financial information and banking details as well as any other details that required for employee verification.

MoMo may collect Special Personal Information about the employee for the fulfilment of an employment contract. This information includes but is not limited to:

- Information relating to the race, gender, sex, pregnancy, marital status, national, ethnic or social origin, color, sexual orientation, age, physical or mental health, well-being, disability, religion, conscience, belief, culture, language and birth of that person.
- Information relating to the education or the medial, financial, criminal or employment history of the person.

MoMo also collects information about the usage of MoMo IT and electronic equipment including, but not limited to, telephone, internet usage and emails as defined in the Acceptable Usage policy.

1.6.1 WHERE IS IT COLLECTED FROM?

MoMo collects Personal Information directly from the Employee. MoMo will inform you whether the information required to be disclosed is mandatory or voluntary. MoMo also collects information about you from other sources with your permission such as third parties, CCTV footage and IT equipment related to your employment or services provided.

1.6.2 WHY IS IT BEING COLLECTED?

MoMo collects your company Personal information (including special company information):

- to carry out and manage business operations;
- to fulfil employee contractual agreement(s);
- for staffing, assessment, recruitment and career development opportunities
- to administer the benefits and services to Employees;
- for purposes of performance management, talent management and succession planning, remuneration and benefits; training and development; management statistics on employment;
- for occupational health administration; work management; business travel; corporate security; organizational charts; archiving emails for disaster recovery purposes, legal reporting obligations; and any other legitimate business interests;
- for the security of MoMo employees and MoMo equipment, facilities and premises

1.6.3 MONITORING WITHOUT NOTICE

MoMo will monitor Employee activity without notice for auditing or when there are grounds for suspecting criminal activity or disciplinary investigations and proceedings; when informing the Employee about the monitoring would make it difficult to prevent or detect such wrongdoing.

1.7 TO WHOM DOES MoMo DISCLOSE EMPLOYEE PERSONAL INFORMATION?

MoMo may disclose your Personal Information to the following recipients when required to do so by law or to fulfil a contractual obligation or for normal business purposes.

- Internal MoMo processing –Information shared with other business units
- Subject to the directive, related legislation, regulators or judicial commissions of enquiry, any court, administrative or judicial forum, arbitration, statutory commission, or ombudsman making a request for data or discovery in terms of the applicable rules.
- Federal or State Inland Revenue Services, or any other similar Government authority.
- Third parties with whom MoMo has a contractual relationship for the hosting of data and/or provision of relevant business services.

1.8 HOW DOES MoMo SAFEGUARD EMPLOYEE PERSONAL INFORMATION

MoMo takes reasonably practical information security measures to ensure the confidentiality, integrity and availability of Personal Information in MoMo's possession against unauthorized or unlawful processing, loss, destruction or damage. MoMo requires Operators to whom MoMo transfers your company Personal Information to agree to our privacy principles, associated policies and practices.

1.9 CROSS-BORDER DATA TRANSFERS.

- MoMo may require processing company Personal Information in other countries for business purposes.
- You agree that MoMo shall ensure that the countries have the adequate data protection laws, corporate security policies, procedures, standards to adequately protect your personal information in accordance with

the standards prescribed by National Information Technology Development Agency (NITDA) or the Honorable Attorney General of the Federation.

- Your personal information may be stored in Nigeria
- Your personal information shall be stored in Oracle Advanced Security Transparent Data Encryption format using Generally Accepted International Security Standards (ISO).
- Your Personal Information shall be subject to the NITDA Data Protection Regulation 2019 (as may be amended from time to time) and any other applicable Data Protection Regulation.

1.10 INTERNAL MOMO COMMUNICATION.

MoMo will use your company Personal Information to send you company news, general communication and internal marketing communications with your consent. During the tenure of your contract, MoMo may collect videos and/or photographic pictures about your resources which may be published internally or externally including but not limited to the MoMo website and MoMo social media pages.

1.11 EMPLOYEE RIGHTS TO PRIVACY

1.11.1 ACCESS TO PERSONAL INFORMATION

You have the right to request a copy of the company Personal Information that MoMo holds about your company. MoMo will take all reasonable steps to confirm your identity before providing details of your company Personal Information.

1.11.2 QUALITY OF PERSONAL INFORMATION

MoMo has established procedures to ensure that Employee company Personal Information is as accurate and complete as possible. Employees are encouraged to regularly check their records for accuracy and ensure any necessary amendments are made to bring records up to date. Keeping your company Personal Information up-to-date and accurate, remains your responsibility. The necessary updates may be done through our E Source portal or HRIS portal as applicable. Where such service is not available to you, you may notify Procurement or HR as applicable, to make the necessary amendments. Some changes will only be made once the necessary supporting documentation has been obtained.

1.11.3 ACCESS TO THIS NOTICE.

You have the right to request a copy of this Notice.

1.11.4 ACCESS TO THIS NOTICE (LANGUAGE)

This Notice is documented in English. As required by law this must be in a language understandable to you. Should this not be the case, MoMo may assist with translation and/or assist with reading this notice to you. This may be necessary to overcome any language barriers or to cater for the visually impaired.

1.11.5 IN THE EVENT OF A BREACH

MoMo takes reasonably practicable security measures to ensure your privacy. In the event of a privacy breach, a designated MoMo official will conduct an internal investigation and provide you with details as to the status of your Personal Information.

1.11.6 RIGHT TO OBJECT TO PROCESSING OF INFORMATION

An employee has a right to object to the procession of their Personal Information. Employees who want to exercise this right must submit their objection in writing to the contact details below.

MoMo may in certain circumstances comply with such a requirement, and in other circumstances, provide the employee with reasons for objecting to such a request.

1.11.7 Contact Details

For further information, queries, complaints, objections relating to the processing of your Personal Information you may contact MoMo at the following details.

Attention: Data Processing Officer

Address: MoMo Payment Service Bank

Email address: dpo@momopsb.com

1.12 CHANGES TO THIS NOTICE

MoMo reserves the right to amend this Notice at any time. All amendments to this Notice will be published on <https://www.momopsb.com>. The current version shall always supersede and replace all previous versions of this notice.

1.13 APPLICABLE LAWS

This Privacy Notice is governed by the laws of the Federal Republic of Nigeria. Any disputes which may arise out of this Privacy Notice are subject to the jurisdiction of Nigerian Courts.

1.14 DATE OF LAST UPDATE

[July 2022]