

FCMB Regal Rewards Privacy Policy

Introduction

Welcome to the FCMB Regal Rewards platform (“the Platform”), operated in partnership between First City Monument Bank (“FCMB”) and Regal Cards Nigeria Ltd (“Regal Cards”, “we”, “our”, or “us”). Your privacy is of utmost importance to us, and this Privacy Policy is intended to explain, in clear and detailed terms, how we collect, use, store, share, protect, and manage your personal data when you interact with our services, including when you access the FCMB Regal Rewards portal via the FCMB mobile banking application or website.

The Privacy Policy also outlines your rights as a data subject and describes how you can exercise those rights in line with the provisions of the Nigeria Data Protection Act 2023 and guidelines issued by the Nigeria Data Protection Commission (NDPC). We understand that data privacy is a cornerstone of trust and user confidence, especially in the financial and digital lifestyle ecosystems, and as such, this policy has been carefully crafted to meet regulatory expectations, comply with industry best practices, and uphold your dignity and autonomy over your personal data.

Our services are offered in Nigeria and made available through a web portal hosted on Wix, a globally recognized website development platform. Though the portal is built using Wix’s infrastructure, the management and data collection are jointly supervised by Regal Cards Nigeria and FCMB. Any reference to “you”, “your” or “user” in this policy refers to customers of FCMB who are registered or interacting with the Regal Rewards platform.

1. Purpose of this Policy

This Privacy Policy serves several important purposes. It seeks to provide clarity on:

- What categories of personal data we collect from users of the FCMB Regal Rewards platform.
- How this data is used, processed, and stored by us and our partners.
- The legal basis for processing such data.
- The security measures we have implemented to ensure the confidentiality and integrity of your information.
- Your rights in relation to your personal data and the procedures for exercising them.
- Our commitment to regulatory compliance and data protection principles.

We encourage all users of the platform to read this policy carefully and to reach out to us using the contact details provided at the end of the policy should you have any questions or require additional information.

2. Scope and Application

This policy applies to all users who access or use the FCMB Regal Rewards platform, regardless of the device or method of access. Whether you are browsing for information, actively redeeming perks, making lifestyle requests, chatting with the concierge, or making purchases through the cashback portal, this Privacy Policy governs the handling of any personal data collected during those interactions.

The policy applies specifically to data collected via the Regal portal hosted on Wix, including any information collected through forms, chat, booking engines, or integrated payment processors. It does not apply to third-party websites or services linked within the platform, unless expressly stated. Where such third parties operate independently, users are encouraged to review their respective privacy policies.

3. Our Legal Basis for Data Collection and Processing

We collect and process your personal data in accordance with applicable data protection laws and only when we have a lawful basis to do so. The lawful bases under which your data may be processed include the following:

- Consent: You provide clear and affirmative consent to allow us to process your data for a specific purpose, such as receiving communication about your bookings or perks.
- Performance of Contract: Your data is necessary for us to provide the services promised under the FCMB Regal Rewards program.
- Legal Obligation: We may process your data where it is necessary for compliance with a legal or regulatory obligation.
- Legitimate Interests: We may process data based on a legitimate business interest, provided that such interests do not override your privacy rights.

4. Information We Collect

The type and scope of personal data we collect are guided by the principle of data minimization, meaning we collect only the data necessary for us to deliver the services expected from the platform.

When you register for the FCMB Regal Rewards program, or interact with our services, we may collect the following types of information:

- Full name as provided by the customer during account or portal registration.
- Phone number and email address, primarily used for communication purposes such as sending confirmation details or alerts regarding bookings and perks.
- FCMB customer ID or employee ID, where applicable, to verify your eligibility and link rewards or bonuses accordingly.

- Membership tier, which helps us tailor the perks and offers you are eligible to access.
- Booking and transaction activity data, such as hotel bookings, flight requests, or concierge interactions, which help personalize your experience.
- Behavioural analytics derived from how you use the platform, including pages visited and links clicked.
- Feedback or reviews voluntarily submitted by you via surveys, chat, or email.

We do not collect sensitive financial information such as debit or credit card numbers directly, as all payments are routed securely through the FCMB payment gateway.

5. Methods of Data Collection

The data we collect may be obtained in a variety of ways, including but not limited to:

- Direct Input: When users sign up, log in, or complete request forms.
- Live Chat Interactions: Where users interact with concierge agents via the integrated chat module.
- Automated Tools: Wix and integrated analytics tools may log user activity and behaviour to enhance system performance.
- Third-Party Payment Processing: Customer payment interactions are logged for reconciliation but are encrypted and managed by FCMB.

All data collected is strictly used for the purpose of delivering the agreed-upon services to you.

6. Data Use and Purpose

The personal data we collect is used solely to support the services offered through the FCMB Regal Rewards program. This includes but is not limited to:

- Authenticating you as a member and confirming eligibility.
- Sending you booking confirmations and updates on your requests.
- Allowing live concierge agents to respond effectively to your needs.
- Informing you of new merchant discounts, cashback opportunities, and special events curated for your membership tier.
- Analysing user interaction trends to enhance product offerings and user experience.

We do not sell or rent your personal data to third parties for marketing or other purposes.

7. Data Retention

Your personal data is retained for only as long as necessary to fulfil the purposes outlined in this policy. Typically, your information is retained throughout the duration of your membership and up to 12 months following the expiration of your subscription to enable us to reconcile pending transactions or benefits. After this period, data is securely anonymized or deleted, unless retention is required by law or regulatory mandate.

8. Data Security

We take the security of your personal data seriously. The Regal portal is hosted on Wix, which provides SSL encryption, firewall protection, and secure hosting infrastructure.

Access to user data is strictly restricted to authorized personnel. Only designated members of the Regal Cards team and nominated personnel from FCMB's technology team have administrative privileges to access backend user data, and such access is granted based on need-to-know principles and role-based access.

Additional safeguards include regular password changes, dual authentication procedures, and system-level audits conducted periodically.

9. Rights of the Data Subject

Under the Nigeria Data Protection Act and related guidelines, you have certain rights with respect to your personal data, including:

- Right of Access: You may request a copy of the personal data we hold about you.
- Right to Rectification: You may ask that we update or correct any inaccurate or incomplete data.
- Right to Erasure: You may request deletion of your data when it is no longer needed for the purpose it was collected.
- Right to Restriction: You can request that your data be restricted from processing under certain conditions.
- Right to Data Portability: You can request that your data be transferred to another service provider in a readable format.

- Right to Withdraw Consent: Where consent is the basis of processing, you can withdraw it at any time.
- Right to Lodge a Complaint: You may lodge a complaint with the Nigeria Data Protection Commission if you believe your data rights have been violated.

10. Data Sharing and Sub-processors

Your data is not shared with any third party unless it is essential for the delivery of services. The only identified sub-processor is FCMB's internal payment gateway, which securely processes payments for membership purchases and related bookings.

Regal Cards does not share your personal data with affiliates, advertising platforms, or non-affiliated companies. Any third-party tools used for chat or email communication are selected carefully based on their compliance with local and international data privacy standards.

11. Cookies and Web Tracking

While the Regal portal does not rely heavily on cookies for its functionality, Wix and embedded integrations may use basic cookies for user session management and behaviour tracking. These are not used to build marketing profiles or to track you across other websites.

Users may opt to disable cookies through their browser settings; however, doing so may limit the platform's full functionality.

12. Updates to This Privacy Policy

This Privacy Policy may be updated periodically to reflect changes in legal requirements, technology, or service enhancements. When updates are made, users will be notified via email or an in-platform banner. The most recent version will always be available on the portal.

13. Contact Information

For inquiries, complaints, or to exercise your data rights, please contact us through the following channels:

Data Protection Officer (DPO) – Regal Cards Nigeria

Email: membership@regal.cards

You may also escalate matters to:

Nigeria Data Protection Commission (NDPC)

Email: info@ndpc.gov.ng

Website: www.ndpc.gov.ng

Signed:



Nnamdi Umezurike

Head of Partnerships

Regal Cards Nigeria

Effective Date: **01/07/2025**