

## **Flutterwave Microfinance Bank – Waitlist Privacy Notice**

### **1. Who We Are**

We are Flutterwave Microfinance Bank Limited ( "Flutterwave MFB", "we", "us", or "our"), a company incorporated under the laws of Nigeria with offices at Hephzibah Place, 8A Iron Bar Street, Lekki Peninsula Scheme 1, Lekki, Lagos State.

If you have any questions about how we use your Personal Data or would like to exercise your data protection rights, please contact us at [privacy@flutterwavego.com](mailto:privacy@flutterwavego.com).

### **2. What Data We Collect**

When you join our waitlist for early access to our banking services, we collect the following Personal Data:

- Full name
- Email address
- Phone number

### **3. Why We Collect Your Data**

We collect and use your Personal Data strictly for the following purposes:

- To add you to our early access waitlist
- To contact you about your participation in early access (including onboarding and testing opportunities)
- To provide you with updates about Flutterwave MFB banking products and features
- To notify you when our services become available to you

### **4. Legal Basis for Processing**

We process your Personal Data based on your consent, which you provide when you sign up for the waitlist.

### **5. How Long We Keep Your Data**

We will retain your Personal Data only for as long as necessary to:

- Manage the waitlist and early access programme; and
- Comply with applicable legal and regulatory obligations

If you choose not to proceed after early access or withdraw your interest, we will securely delete or anonymise your data, unless retention is required by law based on your use of our services.

## **6. Sharing of Your Data**

We may share your Personal Data with trusted service providers who support our operations (e.g., communication tools or infrastructure providers), strictly for the purposes outlined above and under appropriate confidentiality and data protection obligations.

We do not sell your Personal Data.

## **7. Your Rights**

Under applicable data protection laws, you have the right to:

- Be informed on how we process your data.
- Access the Personal Data we hold about you
- Request correction of inaccurate or incomplete data
- Request deletion of your data
- Withdraw your consent at any time
- Object to processing
- Not be subject to decisions based solely on automated processing that produce legal or significantly similar effects
- Data Portability

To exercise any of these rights, please contact [privacy@flutterwavego.com](mailto:privacy@flutterwavego.com).

## **8. Security of Your Data**

We implement appropriate technical and organisational measures to protect your Personal Data against unauthorised access, loss, or misuse.

## **9. International Data Transfers**

As part of providing our services, your Personal Data may be transferred to and processed in countries outside Nigeria. Where this occurs, we ensure that appropriate safeguards are in place to protect your data, in line with applicable data protection laws. These safeguards may include relying on legally approved transfer mechanisms, such as standard contractual clauses or transfers to jurisdictions with adequate data protection frameworks.

## **10. Updates to This Notice**

We may update this notice from time to time. Any updates will be made available on this page.

## **11. Contact Us**

If you have any questions or concerns about this notice or our privacy practices, please contact us at:

[privacy@flutterwavego.com](mailto:privacy@flutterwavego.com).

If you feel that we have not addressed your questions or concerns adequately, you may contact the Nigeria Data Protection Commission [here](#).

## **Definitions**

**Data Protection Laws** : means the Nigeria Data Protection Act (NDPA) 2023, the NDPA General Application and Implementation Directive 2025 and/or any other applicable legislation on the protection of personal data in Nigeria.

**Personal Data**: Any information that can be used to identify a living or natural person including email address, date of birth, mobile number, residential address, payment card, financial information such as bank account number, etc., government-issued Identity credentials (e.g, national ID number, international passport, driver's licence number, etc), or taxpayer identification number. It may also include information that is linked to you, for example, your internet protocol (IP) address, log-in information, information about your device or device's web browser.