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## DATA PRIVACY STATEMENT

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### 1. INTRODUCTION

- 1.1 Momentum Finance Ltd (hereinafter referred to as “we” or “us” or “our”) respects your privacy. This data privacy statement explains how we collect, use, disclose and protect your information when you apply for our products and services.
- 1.2 This statement should be read together with our Terms and Conditions for products and services.
- 1.3 Personal data is information relating to our customer or potential customers (hereafter referred to “you” or “your”)
- 1.4 The data controller of your personal data is Momentum Finance Limited that you have or may have a relationship with.
- 1.5 This statement applies to all customers, suppliers and all clients who has any business dealings with the company.

### 2. SCOPE

This Data Privacy Statement applies to all personal information collected, processed and stored by Momentum Finance Limited during its operations.

### 3. COLLECTION OF INFORMATION

- 3.1 We collect your personal information with your knowledge and consent when you do any of the following (please note that this list is not exhaustive):
  - a) Apply for a specific product or service
  - b) Ask for more information about a product or service or contact us with a query or complaint.
  - c) Respond to or participate in a survey, marketing promotion, prize competition or special offer.
  - d) We may also collect your information from other organizations including credit-reference bureaus, fraud prevention agencies and business directories.
  - e) We may collect your information when you interact with us as a supplier as prescribed in this statement.
  - f) We may also collect information when you visit any of our business premises.
  - g) When you interact with our sales agents, they may collect personal information.

## 3.2 What Information is Collected

The information we collect and store about you includes but is not limited to the following:

- a) **Personal Data:** Demographic and other personally identifiable information such as your name, photograph, address, location, phone number, identity document type and number, date of birth, email address, age and gender
  - b) **Financial Information:** Financial information related to your financial status, including bank account numbers, income, bank statements. Details on your earnings as per your pay slip
  - c) **Data from social networks:** When you contact or engage with us, such as by calling, messaging, or interacting with our official social media platforms including our official website, we may collect and retain records of these interactions. This may include recordings of phone conversations and content
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from messages or exchanges made via social media or other communication channels, in accordance with applicable laws.

- d) **Biographical data:** -This includes information about your family history, such as marital status and family members (next of kin).

### 3.3 Use of Information

We may use and analyze your information for the following purposes:

- a) Processing applications for products and services, effecting payments, transactions and completing instructions or requests
- b) Responding to any of your queries or concerns.
- c) Verifying your identity information through publicly available and/or restricted government databases to comply with applicable regulatory requirements.
- d) Assessing suitability for products and services
- e) Carrying out credit checks and credit scoring.
- f) Keeping you informed generally about new products and services and contacting you with any new product unless you opt out of receiving such marketing messages (you may contact us at any time to opt out of receiving marketing messages or opt out in the SMS process received.
- g) To comply with any legal, governmental or regulatory requirement or for use by our lawyers in connection with any legal proceedings
- h) In business practices including to quality control, training and ensuring effective systems operations.
- i) To understand how you use our products and services for purposes of developing or improving products and services.
- j) Resolve disputes
- k) Preventing and detecting fraud or other crimes and for debt recovery
- l) For research, statistical, survey and other scientific or business purposes.
- m) Provide aggregated data (which do not contain any information which may identify you as an individual) to third parties for research and scientific purpose.
- n) Administer any of our online platforms/websites.
- o) Any other legitimate use

### 3.4. Lawful Basis for processing your information

We will process your personal information based on any of the lawful basis provided for under the Data Protection Law:

- a) The performance of a Product/Service Agreement with you.
- b) Momentum's legitimate business interests.
- c) Compliance with a mandatory legal obligation.
- d) Consent you provide.
- e) Performance of a task carried out in the Public interest.
- f) Protection of Your vital interests.

### 3.5. Retention of Information

We retain your personal data in line with our legal and regulatory obligations and for business and operational purposes. In most cases this will be for seven years from the end of your relationship with us

Anonymized information that can no longer be associated with you may be held indefinitely.

## 4 DISCLOSURE OF INFORMATION

4.1 Any disclosure of your information shall be in accordance with applicable law and regulations. We shall assess and review each application for information and may decline to grant such information to the requesting party.

4.2 We may disclose your information to:

- i. law-enforcement agencies, regulatory authorities, courts or other statutory authorities in response to a demand issued with the appropriate lawful mandate and where the form and scope of the demand is compliant with the law.
- ii. Third party Service providers: We may share your information with third parties that perform services for us or on our behalf, including credit reference check with duly licensed CRBs, Fraud prevention and Anti money laundering agencies and other third-party institutions, payment processing, data analysis, email delivery, hosting services, customer service, and marketing assistance.
- iii. We may share your information with our affiliates, in which case we will require those affiliates to honor this Privacy Statement. Affiliates may include our subsidiaries and joint venture partners
- iv. We may share your information with our business partners to offer you certain products, services or promotions.
- v. Publicly available and/or restricted government databases to verify your identity information to comply with regulatory requirements.
- vi. Debt-collection agencies or other debt-recovery organizations.
- vii. Survey agencies that conduct surveys on behalf of the company.
- viii. Any other person that we deem legitimately necessary to share the data with
- ix. We shall not release any information to any individual or entity that is acting beyond its legal mandate.

### 4.3 Marketing

We may use your personal data to conduct market research and surveys with the aim of improving our products and services and for marketing purposes, promotional events, competitions and lucky draws.

You have full control over whether you receive marketing messages from us. If at any time you no longer wish to receive updates about our products or services opt out at any time through any of the following methods:

- i.) Contact our data protection Office at [dataprotection@momentumfinance.bb](mailto:dataprotection@momentumfinance.bb)
- ii.) Contact our customer care through the following numbers: **Landline (246) 537-3863** or **(246) 288 2696** or email at [info@momentumfinance.bb](mailto:info@momentumfinance.bb)

## 5. ACCESS TO AND UPDATING YOUR INFORMATION

If you believe that our records contain inaccurate or incomplete information about you, please email us via

[dataprotection@momentumfinance.bb](mailto:dataprotection@momentumfinance.bb) or visit any of our branch outlets to make the necessary amendments. Some changes will only be made once the necessary supporting documentation has been obtained. We will take reasonable steps to investigate your concerns and correct inaccurate information in a timely manner.

## 6. SAFEGUARDING AND PROTECTION OF INFORMATION

We have put in place technical, organizational and operational measures to ensure integrity and confidentiality of your data via controls around: access control, physical and environmental security and monitoring and compliance. While we have taken reasonable steps to secure the personal information you provide to us, please be aware that despite our efforts, no security measures are perfect or impenetrable, and no method of data transmission can be guaranteed against any interception or other type of misuse. Any information disclosed online is vulnerable to interception and misuse by unauthorized parties. Therefore, we cannot guarantee complete security if you provide personal information.

## 7. YOUR RIGHTS

Subject to legal and contractual exceptions, you have rights under data protection laws in relation to your personal data. These are listed below: -

- a) Right to be informed that we are collecting personal data about you.
- b) Right to access personal data that we hold about you and request for information about how we process it.
- c) Right to request that we correct your personal data where it is inaccurate or incomplete.
- d) Right to request that we erase your personal data noting that we may continue to retain your information if obligated by the law or entitled to do so.
- e) Right to object and withdraw your consent to processing of your personal data. We may continue to process if we have a legitimate or legal reason to do so.
- f) Right to request restricted processing of your personal data noting that we may be entitled or legally obligated to continue processing your data and refuse your request.

If you wish to exercise any of the rights set out above, please contact us on our data protection email at [dataprotection@momentumfinance.bb](mailto:dataprotection@momentumfinance.bb)

## 8. HOW TO CONTACT US

If you would like to contact us regarding any aspect of this privacy policy, you may do so by emailing our Data Protection Officer at [dataprotection@momentumfinance.bb](mailto:dataprotection@momentumfinance.bb) or by submitting a request through any of our digital platforms.

## 9. RIGHT TO LODGE COMPLAINT

You have the right to lodge a complaint with the relevant supervisory authority that is tasked with personal data protection

## 10. AMENDMENTS TO THIS STATEMENT

We reserve the right to amend or modify this statement at any time, and you are advised to visit this site regularly to check for any amendments

# MOMENTUM FINANCE LIMITED

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28<sup>th</sup> August 2025

*Statement effective date; Version 02*

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