

SYNC FINANCE COMPANY LIMITED

PRIVACY POLICY

Last Updated: March 2026



1. INTRODUCTION

Sync Finance Company Limited (“Sync Finance”, “the Company”, “we”, “our”, or “us”) respects your privacy and is committed to protecting personal data in accordance with the **Nigeria Data Protection Act (NDPA) 2023**, regulations issued by the **Nigeria Data Protection Commission (NDPC)**, and internationally recognized data protection principles.

This policy explains how and why we collect, use, process, disclose, store, and safeguard personal data when individuals interact with our services, website, digital platforms, or personnel. This policy applies to customers and prospective customers, website visitors, employees and job applicants, vendors and service providers, business partners, any other individuals whose personal data we process.

2. ABOUT SYNC FINANCE

Sync Finance is a financial services company providing funding solutions, financial advisory services, and related financial products to entrepreneurs, businesses, and individuals. In delivering these services, we collect and process personal data to facilitate financial transactions, comply with regulatory obligations, and provide efficient customer service.

For the purposes of applicable data protection laws, Sync Finance acts as a Data Controller in respect of personal data processed through our services and platforms.

3. DEFINITION OF PERSONAL DATA

The Nigeria Data Protection Act (NDPA) 2023 defines personal data as any information relating to an individual who can be identified or identifiable, directly or indirectly, through identifiers such as a name, an identification number, location data, an online identifier, or factors specific to the physical, physiological, genetic, psychological, cultural, social, or economic identity of the individual.

4. PERSONAL DATA WE COLLECT

Depending on the nature of our interaction with you, we may collect the following categories of personal data:

- 4.1. **Identity Information** – such as your full name, date of birth, gender, nationality, government-issued identification numbers, photographs or identity verification records.
- 4.2. **Contact Information** – including your email address, phone number, residential or business address.
- 4.3. **Financial Information** – bank account details, transaction history, financial records, credit information, income and employment information.

- 4.4. **Employment Information** – employer details, job title or business ownership details, salary or income information.
- 4.5. **Technical Data** – when you visit our website, we may collect your Internet Protocol (IP) address data, device identifiers, browser type and version, website usage data, cookies and analytics data.
- 4.6. **Sensitive Personal Data** – we may also collect, in certain circumstances, sensitive personal data including your National Identification Number (NIN), biometric data, financial risk profiling information, etc. Such data will only be processed where necessary and in accordance with applicable legal requirements.

5. HOW WE COLLECT PERSONAL DATA

We collect personal data through the following channels:

- 5.1. **Direct Collection** – Personal data may be provided directly when individuals apply for financial services, register on our website, contact our customer support, complete forms or questionnaires, or communicate with our staff by any means.
- 5.2. **Automated Technologies** – When visiting our website, certain technical information may be collected automatically through cookies and analytics technologies.
- 5.3. **Third-Party Sources** – We may receive personal data from credit bureaus, identity verification services, payment processors, business partners, and/or regulatory authorities.

6. LAWFUL BASIS FOR PROCESSING DATA

We process personal data under one or more lawful bases provided under the NDPA.

- 6.1. **Contractual Necessity:** We process data as may be necessary to provide services requested by customers.
- 6.2. **Legal Obligation:** Data processing may be required to comply with regulatory or legal requirements.
- 6.3. **Legitimate Interest:** Data processing may also be necessary for legitimate business purposes such as fraud prevention, service improvement, and operational security.
- 6.4. **Consent:** Processing may be done based on explicit consent provided by the data subject. Where processing of personal data is based on consent, Sync Finance will obtain explicit consent from the data subject before processing their data. Individuals may withdraw consent at any time by contacting us.

7. PURPOSES OF PROCESSING PERSONAL DATA

We process personal data for the following purposes and in line with the lawful bases provided under the NDPA:

7.1. Service Delivery

- Opening and managing customer accounts
- Processing transactions and payments
- Providing financial advisory services

7.2. Customer Relationship Management

- Customer support
- Communications regarding services
- Customer feedback and service improvements

7.3. Compliance and Legal Obligations

- Anti-Money Laundering (AML) compliance
- Know Your Customer (KYC) procedures for customer due diligence and identity verification
- Regulatory reporting obligations

7.4. Business Operations

- Internal audits
- Risk management
- Fraud detection and prevention
- Business analytics

7.5. Marketing and Communications

- Product and service updates
- Promotional communications (with consent where required)

8. DISCLOSURE OF PERSONAL DATA

We may disclose or share personal data with the following categories of recipients where necessary:

Regulatory Authorities – Where required by law, we may disclose personal data to regulatory authorities including the Nigeria Data Protection Commission (NDPC), Central Bank of Nigeria (CBN), finance intelligence units, or other legally authorized entities including law enforcement agencies.

Service Providers – These include third parties engaged to provide services that support our operations such as IT service providers, payment processors, cloud hosting providers, legal and professional advisers, etc.

Business Partners – Where necessary to deliver collaborative financial services.

Note: All third parties processing personal data on our behalf are required to implement appropriate data protection safeguards.

9. INTERNATIONAL DATA TRANSFERS

Where personal data is transferred outside Nigeria, Sync Finance ensures appropriate safeguards are implemented to protect such data in accordance with the NDPA. These safeguards may include contractual protections, binding corporate rules or other legally recognized mechanisms.

10. DATA RETENTION

Personal data will only be retained for as long as is necessary to fulfill the purposes for which it was collected, including compliance with legal, regulatory, and financial reporting obligations. Retention periods may vary depending on the type of data and applicable regulatory requirements.

Once personal data is no longer required, it will be securely deleted or anonymised.

11. DATA SECURITY

We implement appropriate technical and organizational security measures to protect personal data against unauthorized access, disclosure, alteration, destruction, loss, or misuse.

Security measures include data encryption, access controls and authentication systems, secure IT infrastructure, network monitoring, staff confidentiality obligations.

12. DATA SUBJECT RIGHTS

12.1. Under the NDPA, data subjects have the following rights regarding their personal data:

- The right to access personal data held about them
- The right to rectify inaccurate or incomplete personal data

- The right to request erasure of personal data
- The right to restrict processing of personal data
- The right to data portability
- The right to object to certain processing activities
- The right to withdraw consent.

12.2. Individuals may exercise any of their data protection rights by submitting a **Data Subject Request** via email: info@syncfinanceng.com or by completing the **Data Subject Request Form** available on our website.

12.3. Sync Finance will respond to requests within **thirty (30) days**, in accordance with the Nigeria Data Protection Act (NDPA) 2023.

12.4. Additional verification may be required before fulfilling certain requests to ensure the security of personal data.

13. DATA PROTECTION OFFICER

Sync Finance has appointed a **Data Protection Officer (DPO)** responsible for overseeing compliance with data protection regulations and safeguarding personal data processed by the Company.

For any data protection inquiries or complaints, please contact our DPO via email at:

info@syncfinanceng.com

14. COOKIES AND WEBISTE TRACKING

Our website uses cookies and similar technologies to improve user experience, analyse website performance, and enhance security.

A cookie consent banner is displayed on our website allowing users to manage cookie preferences. Further details are available in our [Cookie Policy](#).

15. DATA BREACH MANAGEMENT

In the event of a data breach that poses a risk to individuals' rights and freedoms, Sync Finance will notify the Nigeria Data Protection Commission and affected individuals where required by law, and implement remedial measures to mitigate risks.

16. POLICY UPDATES

This Privacy Policy may be updated periodically to reflect legal, regulatory, operational, or technological changes.

Updated versions will be published on our website.

17. CONTACT INFORMATION

For inquiries or concerns regarding this Privacy Policy or the processing of your personal data, please contact:

Sync Finance Company Limited

Email: info@syncfinanceng.com

18. REGULATORY COMPLAINTS

If you believe your personal data has been mishandled, you may lodge a complaint with the regulatory authority:

Nigeria Data Protection Commission (NDPC)

Website: <https://ndpc.gov.ng>