

Privacy Policy

Effective Date: April 1, 2026

Introduction/Scope

This document is prepared in accordance with the provisions of the Ghana Data Protection Act, 2012 (Act 843) and by extension, the EU General Data Protection Regulation (GDPR). It outlines Enyan Denkyira Community Bank Plc applies and complies with the data privacy principles in processing the personal data of its customers, staff, vendors, visitors, and third parties who interact with the bank.

For personal data of individuals, this document also highlights their rights and covers the data subject(s) whose personal data is collected and processed, in compliance with the DPA.

This privacy statement outlines why and how we collect and use personal information about our customers, clients, vendors, and visitors (collectively referred to as 'data subjects'). It also highlights with whom we might share personal information and how long we keep it. It also makes data subjects aware of their rights under the DPA.

Roles/Responsibilities

The Data Controller

Enyan Denkyira Community Bank Plc is the data controller, and its management is ultimately responsible for implementation.

Enyan Denkyira Community Bank's Data Protection Supervisor (DPS) is responsible for ensuring the accuracy of this document and that it is up to date. The DPS also ensures that data subjects are duly notified before the collection and processing of their personal data by the bank, including data collected via Enyan Denkyira Community Bank's website. All employees and staff of the bank who interact with personal data must also follow the provisions in this policy document.

Policy Statement

Enyan Denkyira Community Bank is committed to protecting the privacy and security of personal data. We are responsible for determining how we hold and use personal information about our data subjects. According to the Ghana Data Protection Act (DPA), Enyan Denkyira Community Bank Plc must notify data subjects of the information contained in this document.

3.1 Enyan Denkyira Community Bank.

Enyan Denkyira Community Bank was incorporated on 11th March, 1980 as a limited liability company registered under the Companies Act, 1963 (Act 179) and licensed by the Bank of Ghana to carry out the business of banking in Ghana. Enyan Denkyira Rural Bank PLC operates in the Ajumako Enyan Essiam District (AEED) and the Mfantseman Municipal all in the Central Region of Ghana

Since its inception, the bank has transformed and improved the lives and businesses of customers in our catchment area by providing reliable, efficient, flexible financial services and offering customer driven products.

The bank also offers mobile and internet banking services which enable customers to access banking services on-the-go.

Due to the nature of the Bank's business and its provision of financial services across the country, the Bank is required to collect and process personal data of Ghanaian individuals, as well as residents and citizens of other countries across the world.

3.2 What Personal Data Do We Need?

The personal data we would collect and process, depending on the particular processing requirement, falls under the following categories:

Data Type	Description of Data
Identity Data	Full Name, maiden name, marital status, title, date of birth, gender, address, employment history and citizenship.
Contact Data	Address, Email Address and Telephone Numbers. Information received during contact through face-to-face meetings, phone calls, emails, letters, and SMS.
Financial Data	Bank account information and bank statements, income and expenditure, financial position, credit history and account number.
Transaction Data	Information regarding the products and services a data subject may have benefited from by using Enyan Denkyira Community Bank, transactional information in respect of products purchased.
Technical Data	Internet protocol (IP) address, login data, details of browser and operating system, time zone setting and location, platforms, and other technology such as device ID, IP, model, and user agent on the devices used to access the Bank's website.
Profile Data	Includes username and password.
Job Application Data	Data submitted throughout the recruitment process e.g. name, email address. Any personal information you provide to Enyan Denkyira Community Bank Plc as part of the recruitment process.
Usage Data	Includes information about how data subject uses our website, products, and services
Marketing and Communications Data	Information about data subject communications with the Bank.

Where the personal data we need to collect falls under a special category of sensitive personal data, the bank's lawful basis of processing will be the explicit consent of the individual, or, where applicable, compliance with a legal obligation, or for legal proceedings/advice.

4. Why We Need the Data

Enyan Denkyira Community Bank ensures that the personal data collected and processed is necessary for collection and shall not collect or process more data than is reasonably required for a particular processing activity.

5. Legal Grounds for Processing

Enyan Denkyira Community Bank identifies, establishes, defines, and documents the specific purpose of processing and the legal basis for processing personal data (including any special categories of personal data processed) before any processing operation takes place under:

- Consent obtained from the data subject.
- Performance of a contract where the data subject is a party.
- Legal obligation that the bank is required to meet.
- Protect the vital interests of the data subject, including the protection of rights and freedoms of the data subject.

- Official authority of the bank or to carry out the processing that is in the public interest.
- National law, such as biometric data.

In addition, every processing purpose has at least one lawful basis for processing to safeguard the rights of the data subjects, as listed below:

Purpose of Processing	Lawful Basis of Processing
Account creation, identity verification and maintenance of records	Contract
Vendor validation/information processing	Contract
Employment	Contract

6. Processing of Personal Data Based on Consent

Where applicable, Enyan Denkyira Community Bank will require the explicit consent of customers, visitors, and other relevant stakeholders to process collected personal data.

Visitors to the Bank's website are expected to read and understand the website privacy notice and then agree to the website's terms of use. By consenting to the privacy policy, data subjects are permitting Enyan Denkyira Community Bank to use or process their personal data specifically for the purpose identified before collection.

On this ground, if any data subject (customer, client, visitor, vendor, staff, or third party) does not agree to Enyan Denkyira Community Bank collecting and processing their personal data, such individual is not allowed to enjoy the bank's service(s) where applicable.

If, for any reason, the bank is requesting sensitive personal data from its stakeholders (external and internal), the individuals will be rightly notified of why and how the information will be used.

Where processing relates to a child under 18 years old, as in the case of DPA, or 16 years old in the case of GDPR, Enyan Denkyira Community Bank shall demonstrate that consent has been provided by the person who holds parental responsibility over the child. Enyan Denkyira Community Bank shall demonstrate that reasonable efforts have been made to verify the age of the child and establish the authenticity of the parental responsibility.

6.1 Withdrawal of Consent

Irrespective of the initial consent given, an individual can withdraw their consent at any time by making a withdrawal of consent request.

[Enyan Denkyira Community Bank](#) demonstrates the data subject (customer, client, visitor, vendor, staff, or third-party) has withdrawn consent to the processing of his or her personal data with written instruction from the data subject.

For child consent, [Enyan Denkyira Community Bank](#) shall demonstrate that the holder of parental responsibility over the specified child has withdrawn consent via written instruction from the parent. The bank will also demonstrate that reasonable efforts have been made to establish authenticity of the parental responsibility when withdrawing consent for the specified child, considering available technology.

Where applicable, the Data Protection Supervisor (DPS) will inform the relevant process owner of this change, and the processing activities that relied upon the consent will be stopped immediately, in accordance with the relevant process.

7. Use of Cookies

The bank's website also uses cookies to help us understand and improve users' experience on the website.

[Enyan Denkyira Community Bank](#) may use the information obtained from the use of our cookies to:

- Recognize a computer when a user visits the Bank's website.
- Track whoever navigates the website
- Analyze the use of its website, such as how many people visit it each day, and
- Manage the website.

8. Disclosure to Third Parties

Aside from situations where the bank may be required to disclose the personal data of individuals in accordance with a legal obligation in response to requests by government authorities or law courts on matters involving national security or law enforcement requirements, [Enyan Denkyira Community Bank](#) will not pass on its data subjects' personal data to third parties without first obtaining consent.

In situations where the processing of personal data will involve an investigation of potential violations of the bank's terms of service, fraud prevention and mitigation, security issue management, and the preservation of the rights and freedoms of staff, customers, and clients, the bank shall establish an appropriate legal ground for such data transfers.

8.1 Cross-Border Transfers

[Enyan Denkyira Community Bank](#) may also engage third parties abroad (such as other Banks, contractors, government-authorized agencies, etc.) that will receive personal data for a certain purpose(s) as part of the bank's processing activities and process it on the bank's behalf. Where this is the case, the bank will enter into a data processing agreement with the third party, ask for consent if the purpose of processing was not initially stated at the inception, and be satisfied that the third party has adequate measures in place to protect the data against accidental or unauthorized access, use, disclosure, loss, or destruction.

These transfers may occur in the following situations:

1. Service providers – we may engage third-party service providers (including IT, cloud hosting, and customer support) that are located outside Ghana.
2. Regulatory obligations – in certain cases, we may share your data with foreign regulators or authorities to comply with applicable laws and anti-money laundering requirements.

In a case where the disclosure is to third parties outside the jurisdiction of the DPA, [Enyan Denkyira Community Bank](#) will ensure that the third party meets the core global regulatory standards before the transfer. The Bank will satisfy itself that:

- The recipient country has adequate data protection controls established by legal or self-regulatory regimes. However, in a case not covered by an adequacy decision:
 1. The Bank has entered into a contract incorporating data protection clauses; or
 2. The transfer is made under approved Binding Corporate Rules (BCRs).

9. Retention of Records

[Enyan Denkyira Community Bank](#) stores a broad spectrum of personal information. All information [Enyan Denkyira Community Bank](#) holds is stored and retained or stored and destroyed in compliance with DPA's guidelines on the retention of records and personal data.

[Enyan Denkyira Community Bank](#) will retain your personal data as long as the information is active on the bank's systems and necessary for the bank's service delivery purposes. This retention period is verified and established with special consideration to the following areas:

- The requirements of the bank
- The type of personal data
- The purpose of processing
- Lawful basis for processing
- The categories of data subjects

As a regulated financial services institution, the bank will retain your personal data for ten (10) years after the exit of the relationship by the data subject, or as may be required by regulation. When the personal data is no longer needed or beyond the stipulated retention period, [Enyan Denkyira Community Bank](#) will delete or destroy it from its systems and records or take steps to securely archive it while protecting your identity and privacy rights.

Data Subject Rights

At any point while [Enyan Denkyira Community Bank](#) is in possession of or processing personal data, the data subject has the right to:

- Request a copy of the information that the bank holds about them.
- Correct the data that is inaccurate or incomplete.
- Restrict processing of their personal data where certain conditions apply.
- Have their data transferred to another organization.
- Object to certain types of processing, like direct marketing.
- Object to automated processing like profiling, as well as the right to be subject to the legal effects of automated processing or profiling.
- Complain and pursue judicial review if the Bank refuses their request under the rights of access without a clear and justifiable reason.

All the above requests will be forwarded should there be a third party involved in the processing of your personal data.

11. Complaints

If for any reason a vendor or contractor, customer, or staff member wishes to make a complaint about how [Enyan Denkyira Community Bank](#) handles or has handled their personal data, or how their complaint has been handled, they have the right to complain directly to;

[Enyan Denkyira Community Bank](#)

NAME	Enyan Denkyira Community Bank Plc Data Protection Supervisor
ADDRESS	P.O. Box 15, Enyan Denkyira
TELEPHONE	+233202028141
EMAIL	basiedu@edruralbank.com

If you are not satisfied with our response, you have the right to lodge a complaint with the Data Protection Commission of Ghana at: info@dataprotection.org.gh

12. Changes to Privacy Notice

We are constantly trying to improve our website and services, so we may need to change this privacy notice from time to time as well. We will alert you to material changes by, for example, placing a notice on our websites and/or by sending you an SMS (if you have your telephone number with us) when we are required to do so by applicable law.