



Guaranty Trust Bank Ltd
RC 152321

GUARANTY TRUST BANK LTD

BACKGROUND

Guaranty Trust Bank is one of Nigeria's most respected financial institutions, known for its service-focused approach and strong presence across Africa. With operations extending into the UK, the Bank needed to meet complex, multi-jurisdictional data protection obligations without disrupting business operations or weakening governance.

Guaranty Trust Bank first engaged The DPO Centre in 2020 to support its UK branch and provide strategic guidance on cross-border data protection matters.

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'Our DPO has consistently delivered a **highly professional** and practical service.'

Rachel Orebote, Head of Governance
and Company Secretary at
Guaranty Trust Bank

KEY CHALLENGES



CONDUCTING TRANSFER RISK
ASSESSMENTS



UPDATING POLICIES AND
PROCEDURES



IMPLEMENTING INTRAGROUP
DSAS

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We are truly appreciative and value the support, which is reflected in **stronger governance**.

Rachel Orebote, Head of Governance and Company Secretary at Guaranty Trust Bank



SOLUTION

The DPO Centre supports Guaranty Trust Bank's UK operations and advises on wider data protection considerations across its global network, supporting compliance across jurisdictions with confidence.

To assess and mitigate international transfer risks, the designated DPO conducted detailed Transfer Risk Assessments (TRA). These examined the types of data transferred, the legal frameworks of recipient countries, and ensured contractual protections were in place. This also included analysing the privacy frameworks and potential access by government authorities in Ghana and Nigeria.

To strengthen governance, the DPO completed a gap analysis, followed by a targeted documentation review. Existing policies are being updated and new materials

drafted, including an International Data Transfer Policy and an Appropriate Policy Document to support biometric data processing in Nigeria.

An Intergroup Data Sharing Agreement (DSA) enables consistent and compliant data sharing across the Bank's global entities, reducing friction while maintaining regulatory control. Face-to-face GDPR training and ongoing DPIA and AI governance guidance give teams the confidence to make informed decisions, manage risk proactively, and innovate responsibly.

OUTCOME

Rachel Orebote, Head of Governance and Company Secretary at Guaranty Trust Bank, said: 'Our DPO has consistently delivered a highly professional and practical service. Their expertise has helped us enhance our data protection practices while giving us confidence that we are meeting our legal and regulatory obligations. We are truly appreciative and value the support, which is reflected in stronger governance and improved organisational awareness within our bank.'

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