



DATA PROTECTION POLICY

Document Name: Data Protection Policy

Document Owner: Internal Control and Compliance

Document Description: The purpose of this Data Protection Policy is to ensure the secure and lawful handling of personal data in accordance with applicable data protection laws and regulations.

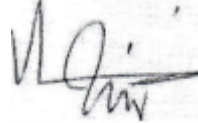
Document History

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Document Approved By - Management

Name	Designation	Signature	Date
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Document Approved By - Board

Name	Designation	Signature	Date
Chief Mrs. Maria Olateju Phillips	Chairman of the Board		September 2025

ACCESSIBILITY

This policy manual is accessible to all employees via the intranet share point

1 INTRODUCTION

1.1 This data protection policy (the “**Policy**”) sets out the approach of LASACO Assurance Plc to handling Personal Data as controllers and processors of Personal Data.

1.2 This Policy includes the following policies (which are available at [lasaco intranet](#)) that set out LASACO’s approach to the processing of Personal Data:

- (a) the Personal Data Incident Notification Policy in relation to the procedures to be followed in the event of an incident relating to Personal Data;
- (b) the Data Transfers Policy in relation to transfers of data to organizations outside of the country;
- (c) the Data Retention & Destruction Policy in relation to the retention of data by LASACO;
- (d) the Privacy Policy for users of LASACO websites.
- (e) This Policy may be amended by LASACO at any time, consistent with the requirements of applicable laws and regulations. Any revisions will take effect from the date on which the amended Policy is published.

1.3 Any breach of this Policy will be taken seriously and may result in disciplinary action.

1.4 Any questions or concerns about the operation of this Policy, including whether this Policy has been followed should be referred to the Data Protection officer.

2 DEFINITIONS

2.1 “**Colleague**” means any employee of LASACO;

“**Data Subject**” means any individual who is the subject of Personal Data that is processed by LASACO;

“**Data Protection committee**” means the data protection steering group of LASACO which includes the DPO; it may be contacted at data.protection@lasacoassurance.com;

“**Data Protection Laws**” means all applicable laws, rules, regulation, directives and governmental requirements relating in any way to the privacy, confidentiality, security, integrity and protection of Personal Data, including without limitation: the Nigeria Data Protection Act 2023 and General Application and Implementation Directive 2025(GAID).;

“**Data Protection Representative**” means an appointed person responsible for data protection matters for a particular business unit of LASACO;

"Global DPO" means the data protection officer for LASACO globally and for NDPC purposes.

"Group Legal" means the legal function of LASACO (which may be contacted via data.protection@lasacoassurance.com);

"Personal Data" means any data relating to an identified or identifiable person, such as name, addresses, email addresses, telephone numbers, dates of birth, identity card numbers, human resources files about employees, details of clients and supplier.

"process" or **"processing"** or **"processed"** means any operation performed upon Personal Data, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure, or destruction;

"Regional DPO" means the data protection officer for LASACO in a particular country or region as set out in Schedule 2;

"Sensitive Personal Data" means any data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic or biometric data, health data, data concerning sex life or sexual orientation, data concerning the commission of any offence;¹ and

"LASACO" means LASACO ASSURANCE PLC and its subsidiaries and/or affiliates.

2.2 Words denoting the singular shall include the plural and vice versa.

3 WHAT IS PERSONAL DATA?

3.1 Personal Data is data relating to an individual. This Policy sets out the approach of LASACO to handling Personal Data (as opposed to business or other data).

4 DPOS, DATA PROTECTION COMMITTEE AND DATA PROTECTION NETWORK

4.1 The Global DPO is responsible for monitoring and enforcing LASACO's compliance with Data Protection Laws and will do so in conjunction with:

(a) other members of the Data Protection committee;

(b) Regional DPOs and

(c) Data Protection Representatives,

The Global DPO and Data Protection representatives will work together to ensure compliance with Data Protection Laws.

4.2 Process for data protection queries, If there are data protection queries, please follow the following process:

- (a)** in the first instance, consult this Policy and/or the other policies mentioned in Paragraph 1.3;
- (b)** if the query cannot be resolved as above, contact your Data Protection Representative or Regional DPO;
- (c)** if the query cannot be resolved as above, contact the Data Protection officer by emailing data.protection@lasacoassurance.com (with a copy to the Data Protection Representative or Regional DPO).

5 COLLECTION AND USE OF PERSONAL DATA

5.1 LASACO collects Personal Data relating to:

- (a)** Applicants for employment, full, part-time and temporary employees ("**Employee Personal Data**");
- (b)** Applicants for employment, full, part-time and temporary whom LASACO may engage

- (c) Contractors ("**Contractor Personal Data**");
- (d) Clients ("**Client Personal Data**");
- (e) Suppliers and other persons who provide goods and/or services to LASACO ("**Supplier Personal Data**"); and
- (f) Users of our websites or other related services provided by LASACO ("**User Personal Data**").

5.2 Employee Personal Data

(a) LASACO may hold and process the following types of Employee Personal Data:

- (i)** personal details: name, address and contact information, national identity/registry/insurance numbers, date of birth, gender, immigration status and eligibility to work;
- (ii)** family composition: names of spouses and/or dependents and emergency contact details;
- (iii)** employment details: CVs, recruitment details and application forms, job history and experience, references, qualifications, appraisals and performance ratings, promotions/demotions, training records, information related to an employment contract, working time records and records relating to holiday and other leave, disciplinary actions, investigations or grievances, and workplace accidents;
- (iv)** education and vocational training, language, and other job-related skills;
- (v)** medical and fitness details;
- (vi)** financial details, including salary, bonuses, expense reimbursement and benefit information, bank account numbers, pensions, and details of any company loans, contractual payment and entitlements; and
- (vii)** Photographs of individuals.

(b) The processing of Employee Personal Data enables LASACO to perform its role as an employer and/or agent, including fulfilling its legal obligations under applicable laws and as necessary in connection with the performance of employment contracts. Without this information it would not be possible for LASACO to perform a worker's employment contract. Certain Employee Personal Data is processed by LASACO for its legitimate business interests, including without limitation:

- (i)** administration and management of its employees;
- (ii)** administration of employee benefits and entitlements;
- (iii)** recruitment and determining suitability for employment or promotion;
- (iv)** conducting employee appraisals and performance evaluations;
- (v)** administering payroll services and other benefits, including pay, allowances, pension, health and life insurance, and other benefits, taxation, and other deductions from pay;
- (vi)** ensuring employee health and safety, monitoring attendance, and determining physical and/or mental fitness to work;

- (vii)** disciplining and investigating suspected misconduct or non-performance of duties;
 - (viii)** responding to grievances and terminating employment;
 - (ix)** training;
 - (x)** ensuring legal and regulatory compliance, including monitoring compliance with internal rules and policies;
 - (xi)** data backup, data archive and document retention; and
 - (xii)** risk management, legal, accounting, and audit functions.
- (c)** LASACO may disclose and/or transfer Employee Personal Data within LASACO or to third parties for the purposes set out above. The parties to whom LASACO may disclose or otherwise transfer Employee Personal Data include:
 - (i)** LASACO's affiliates for purposes consistent with their legitimate business practices and this Policy;
 - (ii)** business associates and other professional advisors;
 - (iii)** third party service providers or processors performing services on LASACO's behalf or providing products, such as:
 - (A)** human resources functions and other business processes, including without limitation recruitment, payroll, employee benefits, and insurance;
 - (B)** operation and maintenance and hosting of information systems;
 - (C)** risk management, compliance, legal and audit functions, and/or support services;
 - (D)** data backup and archive; and/or
 - (E)** insurers;
 - (iv)** to an investigative body in the case of a breach of an agreement or a contravention of law;
 - (v)** as otherwise necessary, required or permitted by law or due to a request from a competent court, regulator or other authority; and
 - (vi)** any prospective third-party purchaser of the shares or assets of LASACO.
- (d)** LASACO may also hold and process the following types of Sensitive Personal Data in relation to employees and seafarers:
 - (i)** racial or ethnic origin only where required for the purposes of compliance with anti- discrimination laws;

- (ii)** religious beliefs, sexual life, sexual orientation and gender reassignment where required by law;
 - (iii)** health data where required by law and/or relating to benefits, accommodation of disabilities, leave entitlement, statutory sick pay, and/or health and safety at work;
 - (iv)** trade union memberships data where required by law if applicable; and
 - (v)** Criminal background data where such checks are required by law.
- (e)** LASACO will only process such Sensitive Personal Data when permitted or required to comply with its legal obligations or where the employee explicit consent has been obtained for the processing of such data (where such consent may be required by local law) or where necessary to protect the individual's vital interests.

5.3 Contractor Personal Data

- (a)** LASACO may hold and process the following types of Contractor Personal Data:
- (i)** personal details, such as information which may identify contractor: name, address of work place, work contact information;
 - (ii)** details, such as information relating to the use of a contractor: job title/function and area of expertise;
 - (iii)** financial details, such as any financial information required for the performance of a contract with any contractors who may be individuals: bank account details for purposes of invoicing, payments and the performance of the contract;
 - (iv)** medical and fitness details;
 - (v)** goods or services provided, including any information relating to goods and services that have been supplied by any contractors; and
 - (vi)** photographs of individuals.
- (b)** The processing of Contractor Personal Data enables LASACO to carry out its legal obligations in connection with the performance of its agreement with contractors. Without this information it would not be possible for LASACO to perform its contractual obligations. Certain Contractor Personal Data is processed by LASACO for its legitimate business interests, including without limitation:
- (i)** keeping records relating to the business and activities carried out between LASACO and any contractors, including records of:
 - (A)** accounts and business records;
 - (B)** risk management, compliance, legal and audit functions; and/or

- (a)** LASACO may hold and process the following types of Client Personal Data:
- (i)** personal details: client name, client business postal address, client business email address, client business telephone number, client personal mobile number;
 - (ii)** financial details: any financial information required for the performance of a contract with clients, in particular, bank account details for purposes of invoicing, payments and the performance of the client contract;
 - (iii)** goods or services provided by the LASACO to the client;
 - (iv)** records of telephone conversations; and
 - (v)** photographs of individuals.
- (b)** The processing of Client Personal Data enables LASACO to perform its role as service provider, including carrying out its obligations in connection with the performance of its client contracts. Without this information it would not be possible for LASACO to perform a client contract. Certain Client Personal Data is processed by LASACO for its legitimate business interests, including without limitation:
- (i)** keeping records relating to the business and activities carried out by the LASACO
 - (A)** general processing relating to the performance of contracts with, and provision of services and/or products to, clients; and
 - (B)** client relationship management, including advertising, marketing and public relations;
 - (ii)** carrying out background checks for anti-corruption/anti-bribery compliance or for anti-money laundering compliance or financial sanctions screening where required by law and credit worthiness; and
 - (iii)** financial records and audits related to client contracts and relationships.
- (c)** LASACO may disclose and/or transfer Client Personal Data within LASACO or to third parties only for the business-related purposes set out above. The parties to whom LASACO may disclose or otherwise transfer Client Personal Data include:
- (i)** LASACO and its affiliates for purposes consistent with their legitimate business practices and this Policy;
 - (ii)** employees and business associates;
 - (iii)** third party processors utilized for risk management, compliance, legal and audit functions;
 - (iv)** legal and other professional advisers, consultants and experts;
 - (i)** financial organizations and advisers;

(ii) insurers;

(iii) persons making an enquiry or complaint, where required by law and/or with consent;

- (iv) to an investigative body in the case of a breach of an agreement or a contravention of law;
 - (v) as otherwise necessary or required or permitted by law or due to a request from a competent court, regulator or other authority; and
 - (vi) any prospective third-party purchaser of the shares or assets of LASACO.
- (b) LASACO may also hold and process the following types of Sensitive Personal Data in relation to clients:
 - (i) Criminal background data only in relation to compliance with anti-corruption and/or anti-bribery where such checks are required by law.
- (c) LASACO will only process such Sensitive Personal Data when permitted or required to comply with its legal obligations or where the client's explicit consent has been obtained for the processing of such data, where such consent may be required by local law.

5.5 Supplier Personal Data

- (a) LASACO may hold and process the following types of Supplier Personal Data:
 - (i) personal details: name/contact;
 - (ii) employment details: work address, work contact information, job title or function;
 - (iii) financial details, such as any financial information required for the performance of a contract with suppliers who may be individuals: bank account details for purposes of payment or expense reimbursement, invoices for services rendered, payment for goods supplied;
 - (iv) goods or services provided, including any information relating to goods and services that have been supplied by suppliers; and
 - (v) photographs of individuals.
- (b) The processing of Supplier Personal Data enables LASACO to perform its obligations in connection with the performance of its contracts with suppliers. Without this information it would not be possible for LASACO to perform a supplier contract. Certain Supplier Personal Data is processed by LASACO for its legitimate business interests, including without limitation:
 - (i) keeping records relating to the business and activities carried out between the LASACO and any suppliers, including records of:
 - (A) accounts and business records;
 - (B) risk management, compliance, legal and audit functions; and
 - (C) financial reporting;
 - (ii) carrying out background checks for anti-money laundering compliance or for the purposes of financial sanctions screening where required by law; and

- (iii) general processing relating to any goods and/or services provided and the performance of contracts with any suppliers.

- (c)** LASACO may disclose and/or transfer Supplier Personal Data within LASACO or to third parties only for the business-related purposes set out above. The parties to whom LASACO may disclose or otherwise transfer Supplier Personal Data include:
- (i)** LASACO and its affiliates for purposes consistent with their legitimate business practices and this Policy;
 - (ii)** employees and business associates;
 - (iii)** third party processors utilized for risk management, compliance, legal and audit functions;
 - (iv)** legal and other professional advisers, consultants and experts;
 - (v)** financial organizations and advisers;
 - (vi)** insurers;
 - (vii)** persons making an enquiry or complaint, where required by law and/or with consent;
 - (viii)** to an investigative body in the case of a breach of an agreement or a contravention of law;
 - (ix)** as otherwise necessary or required or permitted by law or due to a request from a competent court, regulator or other authority; and
 - (x)** any prospective third-party purchaser of the shares or assets of LASACO.
- (d)** LASACO may also hold and process the following types of Sensitive Personal Data in relation to suppliers:
- (i)** criminal background data only in relation to compliance with anti-corruption and/or anti-bribery where such checks are required by law.

- (e) LASACO will only process such Sensitive Personal Data when permitted or required to comply with its legal obligations or where the supplier's explicit consent has been obtained for the processing of such data, where such consent may be required by local law.

5.6 User Personal Data

LASACO will hold and process User Personal Data as set out in the Privacy Policy.

6 PROCESSING OF PERSONAL DATA

6.1 LASACO handles all Personal Data such that it is:

- (a) processed lawfully, fairly and in a transparent manner in relation to the Data Subjects;
- (b) collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes. Further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes will not be considered to be incompatible with the initial purposes;
- (c) adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;
- (d) accurate, where necessary, kept up to date and every reasonable step must be taken to ensure that Personal Data that is inaccurate is erased or rectified without delay;
- (e) kept in a form which permits identification of Data Subjects for no longer than is necessary for the purposes for which the Personal Data is processed; Personal Data may be stored for longer periods insofar as the Personal Data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes subject to implementation of the appropriate measures;
- (f) processed in a manner that ensures appropriate security of the Personal Data, including protection against unauthorized or unlawful processing, accidental loss, destruction or damage, using appropriate measures; and
- (g) only disclosed to third parties or transferred outside a country or region's borders in accordance with Data Protection Laws and ensuring adequate levels of data protection.

7 RIGHTS OF DATA SUBJECTS

7.1 LASACO will respond to requests made by Data Subjects to exercise their legal rights in relation to Personal Data that LASACO holds about them. Subject to applicable exemptions, Data Subjects have the following rights:²

(a) Right to be informed

Right to be informed about any Personal Data held about them by LASACO.

(b) Right of access

Right to request access to their Personal Data and be provided information in relation to that data (including the purposes for which the data is processed, how long it will be stored for, the right to lodge a complaint with a supervisory authority).

(c) Right to rectification

Right to have their inaccurate Personal Data amended.

(d) Right to erasure

Right to have their Personal Data erased where it is no longer necessary, unlawfully processed, or consent is withdrawn.

(e) Right to restrict processing

Right to restrict processing of their Personal Data.

(f) Right to data portability

Right to receive a copy of their Personal Data in a machine-readable format or to have their Personal Data sent to another entity.

(g) Right to object

Right to object to the processing of their Personal Data.

(h) Right in relation to automated decision making and profiling

Right not to be subject to a decision which is based on automated processing or profiling that could result in a significant effect on the Data Subject, such as discriminatory effects.

8 SUBJECT ACCESS REQUESTS

8.1 If making a request to access your Personal Data please follow the instructions at www.lasacoassurance.com and send to data.protection@lasacoassurance.com the necessary documents.

8.2 If you receive a request from a third party requesting access to their Personal Data or any of the other rights set out in Paragraph 7, please contact data.protection@lasacoassurance.com immediately, because LASACO must respond to the request within prescribed time limits. You must not provide any requested information to a third party unless approved by the Data Protection

Steering Group.

8.3 LASACO shall handle subject access requests as follows:

- (a)** LASACO shall identify the data subject;
- (b)** LASACO shall provide the requested information within one month of receipt of request; this period may be extended by two further months where necessary, taking into account the complexity and number of the requests; LASACO shall inform the data subject of any such extension within one month of receipt of the request, together with the reasons for the delay.
- (c)** where the data subject makes the request by electronic form means, the information shall be provided by electronic means where possible, unless otherwise requested by the data subject;
- (d)** where the request concerns a large quantity of information, LASACO reserves the right to ask the data subject to specify the information the request relates to;
- (e)** if LASACO does not take action on the request of the data subject, LASACO shall inform the data subject within one month of receipt of the request of the reasons for not taking action and on the possibility of lodging a complaint with a supervisory authority and seeking a judicial remedy; and
- (f)** LASACO reserves the right to charge a reasonable fee for access or not to act on the request, where permitted by law.

9 APPOINTING DATA PROCESSORS

9.1 When appointing third parties to carry out processing of Personal Data on LASACO's behalf, LASACO shall impose contractual obligations dealing with the protection and security of that information such that these third parties are contractually required to, amongst other obligations, act in a manner consistent with LASACO's instructions when processing Personal Data and that they have in place appropriate technical and organizational security measures to safeguard such Personal Data.

10 DATA PROTECTION IMPACT ASSESSMENTS (DPIAs)

10.1 LASACO shall conduct Data Protection Impact Assessments (DPIAs) in accordance with the Nigeria Data Protection Act (NDPA) 2023 and the General Application and Implementation Directive (GAID) 2025, as issued by the Nigeria Data Protection Commission (NDPC).

10.2 A DPIA shall be carried out before any processing operation that is likely to result in a high risk to the rights and freedoms of data subjects, particularly when:

- New or emerging technologies are introduced;
- Processing involves large-scale profiling, automated decision-making, or systematic monitoring;

- There is large-scale processing of sensitive personal data; or
- Cross-border transfers or data-sharing arrangements are envisaged.

The DPIA shall identify and assess potential privacy risks, evaluate the necessity and proportionality of the processing, and determine appropriate technical and organizational measures to mitigate identified risks.

11 RECORDS KEEPING

11.1 LASACO maintains various records including the following:

- (a)** processing activities carried out by LASACO;
- (b)** consents provided by Data Subjects (where applicable); and
- (c)** data protection related policies and procedures.

12 BREACH NOTIFICATION

12.1 LASACO has in place the Personal Data Incident Notification Policy to be followed in the event of an incident and/or breach in relation to Personal Data.

13 TRANSFERS TO THIRD COUNTRIES

- 13.1** Given the international nature of LASACO's operations, Personal Data collected in the NIGERIA may be transferred to countries outside NIGERIA or 'Third Countries' which may not have laws offering the same level of protection for Personal Data as those inside NIGERIA. international transfers will only occur to jurisdictions with adequate protection as determined by the NDPC. LASACO will take steps to prevent the transfer of Personal Data without adequate safeguards being put in place and will ensure that Personal Data collected in NIGERIA and transferred internationally is afforded the same level of protection as it would be inside NIGERIA. LASACO will execute Data Transfer Agreements or Standard Contractual Clauses (SCCs) when required.

14 DATA RETENTION

- 14.1** LASACO has in place the Data Retention & Destruction Policy to be followed in respect of the retention of Personal Data.

15 BREACHES OF THIS POLICY

- 15.1** Any actual or suspected breach of this Policy should be immediately notified to the Data Protection Committee by contacting data.protection@lasacoassurance.com.

16 DOCUMENT CONTROL

- 16.1** The Global DPO is the owner of this Policy and is responsible for ensuring that it is reviewed in line with the relevant review requirements.
- 16.2** A current version of this Policy is available at www.lasacoassurance.com

Schedule 1

LASACO data Controllers

	Compan	Countr
1.	LASACO ASSURANCE PLC	NIGERIA

Schedule 2

LASACO DPO and regional officers

DPO	Name	Email	Address	Telephone no.
Global DPO (globally and for NDPC purposes)				
Global DPO	Olamide Ogunlade	dpo@lasacoassurance.com	LASACO Assurance Plc 16, acme road Ogba Lagos Nigeria	+234 8102904256
Regional DPOs / regional officers				
Abuja	Mr Kunle Hamzat	kunlehamzat@lasacoassurance.com	2 nd Floor Abia House Plot 979, 1 st Avenue Ahmadu Bello Way, Central Business District	08055065371
Alausa	Mrs Yemi Ajani	yemiajani@lasacoassurance.com	Lagos State Government Secretariat Complex, Alausa	07023814920
Ibadan	Mr. Kayode Okeremi	kayodeokeremi@lasacoassurance.com	Sijuwola House, 2nd Floor, 5 Fajuyi Road, Dugbe, Ibadan.	08069135662
Akure	Mr.Olasunkanmi Alere	sunkanmialere@lasacoassurance.com	Recabil House 47, Oba Adesina Road Akure	08052554042
Port Harcourt	Mrs Toyin Iriabe	tiriabe@lasacoassurance.com	200, Aba Road, Waterline Bus Stop, Port - Harcourt	08064348913
Yola	Mr. Shedrack Genesis	shedrackgenesis@lasacoassurance.com	NO 1, Bishop Street, Adamawa Homes and Saving Building, Jimeta -Yola State.	08067840772
Kaduna	Mr. Kazeem Shobowale	kazeemshobowale@lasacoassurance.com	HAMZA ZAYYAD HOUSE 4, Muhammad Buhari Way, off Ahmadu Bello way, Kaduna State	08028542539
Ikorodu, Lagos State	Mrs. Taibat Adenuga	taibatadenuga@lasacoassurance.com	Ground Floor Occupants, 47 T.O.S Benson Road Ipakodo, Ikorodu Lagos State	08034234208
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