

LASACO Assurance PLC is committed to ensuring that the privacy and personal information of its clients and employees (data subjects) are protected. LASACO Assurance PLC is the entity that collects and processes your personal information and the responsibility is not outsourced to any third party. LASACO Assurance PLC is also responsible for complying with extant Nigerian laws on data protection. For the purpose of this Privacy Policy, references to LASACO Assurance PLC or the Company shall mean LASACO Assurance PLC.

Personal Data comprises all the details we hold or collect on our employees, customers, stakeholders vendors and other interested parties, directly or indirectly and includes any offline or online data that makes a person identifiable such as names, addresses, phone number, passport ID, usernames, passwords, digital footprints, photographs, financial data, assets and liabilities, insurance, savings and investments, health and high-risk information about products and services purchased from us. These data may be received from third parties or collected using our website(s), mobile app, USSD code and other digital channels.

With this policy, we ensure that we gather, store and handle data fairly, transparently and with respect towards individual rights. For the purposes of this Privacy Policy, references to "we" or "us" shall refer to LASACO and its entities/subsidiaries.

This Privacy Policy should be brought to the attention of any party who is included in your Policy or on whose instruction you are providing us with their personal data.

By providing your personal information or the personal information of someone included in your policy, you acknowledge that we may use it only in the ways set out in this Privacy Policy. We may provide you with further notices highlighting certain uses we wish to make of your personal information.

There may be a need to update this policy periodically, for example as a result of government regulation, new technologies or other developments on data protection and / or privacy laws. The current version of this policy is available on our website (www.lasacoassurance.com)

Table of Contents

ROLE DEFINITIONS 3

Data Subject 3

Data Administrator..... 3

Data Controller..... 3

Data Protection Officer 3

1. Introduction 4

2. Type of Information Processed by LASACO Assurance PLC..... 4

 2.1 Information about the data subject..... 4

 2.2 Means of identification..... 4

 2.3 Contact information..... 4

 2.4 Online information 4

 2.5 Financial information..... 4

 2.6 Contractual information 5

3. Requirement for Consent..... 5

4. Reasons for use and process of data by LASACO Assurance PLC 5

5. Methods of collecting private information..... 6

6. LASACO Assurance PLC’s Use of Cookies..... 7

7. Social Media Platforms 7

8. Third Party Access and Purpose of Access 7

 8.1. Disclosure to Employees..... 7

 8.2. Disclosures to Third Parties 8

9. Lawful Processing of Personal Data 9

10. Foreign Transfer of Personal Data..... 14

11. Length of time for keeping client personal information..... 15

12. Data Subject’s Rights..... 15

13 Training 17

14 Marketing..... 18

15. Audit and Enforcement of the Data Protection Policy 18

16. Remedies for Violation of Data Protection Policy and the Timeframe for Remedy 18

17. Download LASACO Assurance PLC data privacy policy 19

ROLE DEFINITIONS:

The following roles are defined for the purpose of this policy:

Data Subject: is an identifiable person; one who can be identified directly or indirectly, in particular by reference to an identification number or to one or more factors specific to his physical, physiological, mental, economic, cultural or social identity and includes LASACO Assurance PLC's clients, customers, business partners and employees.

Data Administrator: means a persons or organization that processes data. For the purpose of this policy, LASACO Assurance PLC is the Data Administrator.

Data Controller: means a person who either alone, jointly with other persons or in common with other persons or as a statutory body determines the purposes for and the manner in which personal data is processed or is to be processed. For the purpose of this policy, the Managing Director is the Data Controller or whoever he so delegates.

Data Protection Officer: is appointed by the data controller to ensure that the strategy and implementation of data protection requirements are in compliance with the data protection policy and the relevant extant laws. For the purpose of this policy, the data protection officer is defined as the Chief Compliance Officer of LASACO Assurance PLC.

Responsibilities of the Data Administrator, Data Controller and Data Protection Officer are clearly outlined in the Nigeria Data Protection Regulation (2019).

1. Introduction

When LASACO Assurance PLC collect and process the personal information of its data subjects, LASACO Assurance PLC ensures it adheres to strict controls to ensure that personal data of the data subject is obtained and used in line with the company's privacy principles. LASACO Assurance PLC handles personal data with the greatest care and uses it only for legitimate and specified business purposes under the following principles:

- A. LASACO Assurance PLC respects the privacy rights of its employees, customers, clients, business partners and other individuals whose personal data are in its custody and use.
- B. LASACO Assurance PLC protects personal data by implementing appropriate technical and organizational measures in our data processing operations.
- C. LASACO Assurance PLC obtains personal data fairly and only use it for legitimate business purposes.
- D. LASACO Assurance PLC holds itself accountable for demonstrating compliance with applicable legal and regulatory requirements and understanding of our roles and responsibilities.

All personal information collected by LASACO Assurance PLC is processed in accordance with the extant data protection laws in Nigeria.

2. Type of Information Processed by LASACO Assurance PLC

The precise nature of the personal data LASACO Assurance PLC processes depends on data subject's relationship with LASACO Assurance PLC. However, in many cases, if the Company is handling the data subject's personal data as part of its role as an insurer, the Company may process the following:

- 2.1 Information about the data subject** – for example name, age, gender, date of birth, nationality. Although in some instances LASACO Assurance PLC may not receive your name, the Company needs enough information to identify the data subject and policy so that the Company can provide services to her clients.
- 2.2 Means of identification** - date of birth, National Identity Card Number (NIN), International Passport, details, Drivers' License, Voter's card details, etc.
- 2.3 Contact information** – in some cases, for example, the Company may receive the data subject's email, address, and phone number.
- 2.4 Online information** – for example cookies and Internet Protocol Address, if you use LASACO Assurance PLC's websites.
- 2.5 Financial information** – the Company may process information related to payments the data subject makes or receive in the context of an insurance policy or claim. This includes information such as Bank Verification Number (BVN) and information obtained from credit reference agencies.

- 2.6 Contractual information** – for example details about the policies a data subject holds and with whom the data subject holds them.
- 2.7 Health information** such as smoker status or medical related issues relevant to a policy the data subject holds or a claim the data subject has made.
- 2.8 Other sensitive personal data** (Health background / information, Marital status, criminal history record, Biometric details, Academic records, and Gender)

3. Requirement for Consent

- 3.1.** Where data subjects provide their consent for use of their personal information, LASACO Assurance PLC will explain the reason for obtaining the data subject's consent. Without such consent, LASACO Assurance PLC may be unable to provide the required cover or handle claims when they arise. Where the data subject provides personal information about third parties, LASACO Assurance PLC will ask such clients to confirm that the third party has given consent to the data subject to act on their behalf and will provide LASACO Assurance PLC with a copy of the consent issued.
- 3.2.** Consent will be obtained via the same medium used to obtain personal information or through any other means that is acceptable to LASACO Assurance PLC. Reference will be made to this Policy or a summarized version that can be easily understood by the data subject. The data subject will be required to indicate understanding and acceptance of the terms contained in the policy. This can be via signature for physical documents or a ticked checkbox for electronic platforms.
- 3.3.** Where LASACO Assurance PLC has appropriate, legitimate business need to use client personal information for maintenance of business records including development and improvement of products and services, LASACO Assurance PLC will take extra care to ensure that the data subject's rights to security and confidentiality is not infringed upon.

4. Reasons for use and process of data by LASACO Assurance PLC

- 4.1.** LASACO Assurance PLC will obtain the consent of the data subject before use and processing of the data for one or more specific purposes made known to the data subject.
- 4.2.** Such personal data obtained with the consent of the data subject shall not be used in any manner other than the stated purpose for which the data was obtained, except with further consent of the data subject whether at the instance of the data subject or upon LASACO Assurance PLC's engagement with the data subject.
- 4.3** LASACO Assurance PLC may use data subject's personal data for a number of reasons:
- 4.3.1. Underwriting our business with our clients
 - 4.3.2. Managing claims

- 4.3.3. Assessing, improving and developing our services
- 4.3.4. Enhancing our knowledge of risk and insurance markets in general
- 4.3.5. Fulfilling legal or regulatory obligations and protecting ourselves and our clients against fraud. Such regulators include National Insurance Commission, National Financial Intelligence Unit and such other regulatory agencies that are created from time to time.
- 4.3.6. For the protection of public interest such as investigation of fraudulent claims and anti-money laundering checks.
- 4.3.7. For archiving purposes in the public interest, scientific or historical research purposes or statistical purposes.
- 4.3.8. For the purpose of assessment of proposed data subject's employability and other employee benefits-related purposes.

4.4 LASACO Assurance PLC applies information protection technologies including perimeter security, malware management, data loss prevention and backup & recovery. LASACO Assurance PLC's data centers are also protected against environmental threats. LASACO Assurance PLC's information security policies and practices apply to all personal information in the company's custody.

4.5. LASACO Assurance PLC will only transfer personal information to a third party where the company has ensured that such information is protected and the data subject's consent has been obtained. LASACO Assurance PLC will procure the privacy policy of the Third Party to guarantee the safeguard and protection of the personal data of the data subject in the custody of the third party. No consent shall be sought, given or accepted in any circumstance that may engender direct or indirect propagation of atrocities, hate, child rights violation, criminal acts and anti-social conducts.

5. Methods of collecting private information

5.1. In most cases, LASACO Assurance PLC receives personal data from third parties such as its corporate clients and may also receive personal data directly from the data subject.

5.2. The following shall comprise the method of collection of personal information:

- 5.2.1. Direct collection:
 - 5.2.1.1. Know Your Customer (KYC) forms
 - 5.2.1.2. Claim forms
 - 5.2.1.3. Forums and feedback forms
 - 5.2.1.4. Enquiry and Quote forms
 - 5.2.1.5. Recorded telephone conversations
 - 5.2.1.6. Digital touch points
 - 5.2.1.7. Electronics means (emails and apps)
 - 5.2.1.8. Employee engagement personal data forms (inclusive of medical report)
- 5.2.2. Third party's data collection source:
 - 5.2.2.1. Individuals or employers with policies with LASACO Assurance PLC under which a data subject is insured i.e. a named individual within a group life insurance policy.
 - 5.2.2.2. Credit reference agencies including credit ratings.
 - 5.2.2.3. Family members in the event of incapacitation or death of the insured for purpose of claims payment
 - 5.2.2.4. Medical professionals and hospitals

- 5.2.2.5. Aggregators
- 5.2.2.6. Loss adjusters, claim assessors, etc.

Provided that in the case of data obtained from third party source, a copy of the data subject's consent given to the third party to transfer the data to LASACO Assurance PLC shall suffice for the company's use and processing.

We collect personal information directly from you:

- Via enquiry, registration, claim forms, feedback forms and forums
- When you purchase any of our products or services;
- When you fill out a survey, or vote in a poll on our website;
- Through quotes and application forms;
- Via cookies. You can find out more about this in our [cookies policy](#);
- Via our telephone calls with you, which may be recorded;
- When you provide your details to us either online or offline;
- Via live chat, chat box and profilers
- Through web analytics tags

We also collect your personal information from several different sources including:

- Directly from an individual or employer who has a policy with us under which you are insured, for example you are a named driver on your partner's motor insurance policy;
- Directly from an employer which funds a Health Insurance policy that we administer where you are a beneficiary; from social media, when fraud is suspected; and
- Other third parties including:
 - Your family members where you may be incapacitated or unable to provide information relevant to your policy;
 - Contractors, consultants, business partners who sell our products and services via their platforms and channels
 - Medical professionals and hospitals; aggregators (such as price comparison websites); third parties who assist us in checking that claims are eligible for payment; third parties such as companies who provide consumer classification for marketing purposes e.g. market segmentation data; and
 - Third parties who provide information which may be used by LASACO to inform its risk selection, pricing and underwriting decisions

6. LASACO Assurance PLC's Use of Cookies

- 6.1.** LASACO Assurance PLC's websites use cookies to track browsing history of visitors to improve their experience. All LASACO Assurance PLC websites provide visitors an option to accept the use of cookies during the browsing session. Consent must be received before any form of data processing can be performed. Every consent given by a data subject will be kept secured as evidence that consent was received.
- 6.2.** In the case of LASACO Assurance PLC's customers, the data subject will provide consent by responding to a dialogue box corresponding to declarations indicating whether consent is given or declined. Such declaration will be in clear and plain language. For children's personal data, consent will be sought from their legal guardian.

7. Social Media Platforms

- 7.1.** The data subject may wish to participate in the various blogs, forums, and other social media platforms hosted by LASACO Assurance PLC ("Social Media Platforms") which are made available to the data subject. The main aim of these Social Media Platforms is to facilitate and allow the data subject share content. However, LASACO Assurance PLC cannot be held responsible if the data subject shares personal information on Social Media Platforms that is subsequently used, misused or otherwise appropriated by another user. The data subject is required to consult the Privacy Statements of such services before using them.

8. Third Party Access and Purpose of Access

8.1. Disclosure to Employees

- 8.1.1.** LASACO Assurance PLC's employees have access to and process personal data based upon a "need to know" basis in order to do their job. LASACO Assurance PLC regularly check who has access to its systems and data.

8.2. Disclosure to Third Parties

- 8.2.1.** LASACO Assurance PLC may disclose data subject's personal data to these categories of third parties:
- 8.2.2.** LASACO Assurance PLC service providers and agents e.g. IT companies who support LASACO Assurance PLC's technology, marketing agencies, research specialists, document management providers and tax advisers.
- 8.2.3.** LASACO Assurance PLC professional advisers: auditors; reinsurers; medical agencies and legal advisers.
- 8.2.4.** Client who provide LASACO Assurance PLC with data subject's personal data.
- 8.2.5.** Persons legally authorized to act on behalf of LASACO Assurance PLC e.g. Lawyers, Insurance Brokers and loss adjusters, etc.

- 8.2.5.1 Individuals nominated and authorized by the data subject to engage LASACO Assurance PLC on his/her behalf.
 - 8.2.5.2 A LASACO Assurance PLC recommended garage or other service provider recommended to the data subject.
 - 8.2.5.3 Disclosure to Credit referencing organization to obtain information which may be used by LASACO Assurance PLC to determine its risk selection, pricing and underwriting decisions.
 - 8.2.5.4 Fraud detection agencies and other parties who maintain fraud detection registers.
-
- 8.2.1.9. Customer relationship management
 - 8.2.1.10. Independent Customer satisfaction survey providers.
 - 8.2.1.11. Financial organizations and advisers.
 - 8.2.1.12. Government and its agencies.
 - 8.2.1.13. Emergency assistance Companies.
 - 8.2.1.14. Credit reference agencies.
 - 8.2.1.15. Debt collection agencies.
 - 8.2.1.16. Selected third parties in connection with the sale, transfer or disposal of the business or in connection with employee assessment, academic records verification and employee well-being survey.

The above disclosures to the third party shall be made only to the extent necessary for the specific purpose for which the data is provided and the third party shall be informed of the confidential nature of such information and shall be directed to keep the data subject's information strictly confidential

9. Lawful Processing of Personal Data

- 9.1.** LASACO Assurance PLC only processes personal data for legitimate business purposes and when a legal ground as set out in data protection regulation.
 - 9.1.1 There are a number of legal grounds that may apply and the following ones most likely to be relevant to the data subject:
 - 9.1.1.1 LASACO Assurance PLC may process the personal data of the data subject when LASACO Assurance PLC obtains the data subject's consent or when LASACO Assurance PLC's client obtains consent from the data subject
 - 9.1.1.2. Where the data subject has a contract with LASACO Assurance PLC, the personal data of the data subject may be processed when it is necessary in order to enter into or perform a contract.
 - 9.1.1.3. Where LASACO Assurance PLC has a legal obligation to perform such processing, such as where LASACO Assurance PLC shares information with its regulators, law enforcement agencies or court.
 - 9.1.1.4. In order to protect the vital interests of the data subject or of another natural person.
 - 9.1.1.5. In order to process the data subject's medical and other sensitive personal data when it is necessary to do so in connection with an insurance product.
 - 9.1.1.6. Where LASACO Assurance PLC is required to do so by law or regulatory bodies such as where a court order exists to such effect or there is a statutory obligation to do so.

- 9.1.1.7. Where it is necessary to facilitate prevention and/or detection investigation of criminal action (including fraud) or is otherwise in the overriding public interest.
- 9.1.1.8. Where exemptions under the Data Privacy law allows LASACO Assurance PLC to disclose such information.
- 9.1.1.9. Motor insurance database i.e. Nigeria Insurance Industry Database (NIID).
- 9.1.1.10. Where processing is necessary for the performance of a task carried out in the public interest or in the exercise of public mandate vested in LASACO Assurance PLC
- 9.1.2. Another legal ground for processing personal data is when LASACO Assurance PLC has a legitimate interest in so doing and can demonstrate that the interests are not outweighed by the data subject's rights or interests. Where LASACO Assurance PLC relies on legitimate interests grounds for processing, LASACO Assurance PLC will make sure it processes only the minimum amount of data necessary and for the minimum amount of time necessary to achieve its objectives which includes:
- 9.1.2.1. To enable LASACO Assurance PLC identify whether its products or services are operating effectively;
- 9.1.2.2. To enable LASACO Assurance PLC develop new products and services and make sure its offerings are fair;
- 9.1.2.3. To enable LASACO Assurance PLC ascertain that its clients and policy holders are treated fairly.

Other grounds include

How do we use your personal information?

Under data protection laws we need a reason to use and process your personal information and this is called a legal ground. We have set out below the main reasons why we process your personal information and the applicable circumstances when we will do so:

- Processing is necessary in order for us to provide your insurance policy and services, such as assessing your application and setting you up as a policyholder or investments account holder, beneficiary, administering and managing your insurance policy or benefits, providing all related services, providing a quote, handling and paying claims and communicating with you. In the se circumstances, if you do not provide such information, we will be unable to offer you a policy or process your claim.
- We may use Cloud storage solutions within or outside Nigeria which are chosen to ensure efficiency and improved performance through up to date technology.
- Where we have a legal or regulatory obligation to use such personal information, for example, when our regulators such as the National Insurance Commission (NAICOM), the Securities and Exchange Commission (SEC), the National Health Insurance Scheme (NHIS), and our data protection regulator, the National Information Technology Development Agency (NITDA) wish us to maintain certain records of any dealings with you.

- To comply with: local or foreign laws, regulations, voluntary codes, directives, judgments or court orders, agreements between any member of LASACO, LASACO Group and any authority, regulator, or enforcement agency; policies (including the LASACO Group's policies), good practice, government sanctions or embargoes, reporting requirements under financial transactions legislation and demands or requests of any authority, regulator, tribunal, enforcement agencies [i.e. the Nigeria Financial Intelligent Unit (“NFIU”) and the Economic and Financial Crime Commission (“EFCC”), or exchange body;
- Where we need to use your personal information to establish, exercise or defend our legal rights, for example when we are faced with any legal claims or where we want to pursue any legal claims ourselves.
- Where we need to use your personal information for reasons of substantial public interest, such as investigating fraudulent claims and carrying out fraud, credit and anti-money laundering checks, identification checks.
- Where we need to communicate with you to resolve complaints or other issues
- Where we have a specific legal exemption to process sensitive personal data for insurance purposes. This exemption applies where we need to process your information as an essential part of the insurance cover, for example health data.
- Where you have provided your consent to our use of your personal information. We will usually only ask for your consent in relation to processing your sensitive personal information (such as health data) or when providing marketing information to you (including information about other products and services). This will be made clear when you provide your personal information. If we ask for your consent, we will explain why it is necessary. Without your consent in some circumstances, we may not be able to provide you with cover under the policy or handle claims or you may not be able to benefit from some of our services. Where you provide sensitive personal information about a third party, we may ask you to confirm that the third party has provided his or her consent for you to act on their behalf.
- Where we have appropriate legitimate business need to use your personal information such as maintaining our business records, developing and improving our products and services, all whilst ensuring that such business need does not interfere with your rights and freedoms and does not cause you any harm.
- Where we need to use your sensitive personal information such as health data because it is necessary for your vital interests, this being a life or death matter.

The following table contain breakdown of lawful grounds which LASACO Assurance PLC relies on for processing personal information of its clients:

#	Purpose for collection and processing of data subject's personal information	Collectable Personal information includes but not limited to the ones set out below	Legal grounds for processing personal information
1	To review an insurance proposal and provide a quote in respect of the proposal.	<p>Contact details, age, age of other persons included on the policy (e.g. employees, family members, etc.)</p> <p>Information on the subject of insurance such as landed property, vehicles, past claims, recent damage, business premises, etc.</p> <p>Information on travel plans including destination, duration of stay, travel dates, etc.</p> <p>Information on nature of commercial enterprise and assets.</p> <p>Sensitive personal information such as health records.</p> <p>Any other information</p>	<p>The use described is necessary for provision of insurance cover.</p> <p>Where sensitive personal information is requested, exemptions may be applied for insurance purposes.</p>
2	To provide and manage insurance policies. To evaluate eligibility for, process and pay claims.	<p>Contact details, age, age of other persons included on the policy (e.g. employees, family members, etc.)</p> <p>Information on subject of insurance such as landed property, vehicles, past claims, recent damage, business premises, etc.</p> <p>Information on travel plans including destination, duration of stay, travel dates, etc.</p> <p>Information on the nature of commercial enterprise and assets.</p> <p>Sensitive personal information such as health</p>	<p>The use described is necessary for provision of insurance cover.</p> <p>Where sensitive personal information is requested, exemptions may be applied for insurance purposes.</p>
3	For data subject's communication and resolution of complaints.	Contact details and any information relevant to the policy.	The use described is required to provide the insurance cover and to resolve any legitimate

#	Purpose for collection and processing of data subject's personal information	Collectable Personal information includes but not limited to the ones set out below	Legal grounds for processing personal information
			Where sensitive personal information is requested, it may be necessary for the exercise and defense of LASACO Assurance PLC's legal rights, where the client has provided consent or where we have applied and obtained exemption for insurance purposes.
4	To evaluate insurance applications and data subject's ability to pay premiums in instalments or as at when due.	Contact details, bank account details, collateral information	Necessary to provide insurance cover.
5	To prevent, detect and investigate fraud..	<p>Contact details, age, age of other persons included on the policy (e.g. employees, family members, etc.)</p> <p>Information about possessions such as landed property, vehicles, past claims, recent damage, business premises, etc.</p> <p>Information about nature of commercial enterprise and assets.</p> <p>Information available in the public domain such as social media.</p> <p>Sensitive personal information such as biometrics (i.e. voice print).</p>	<p>Necessary to provide insurance cover and a legitimate business need to prevent fraud.</p> <p>Where sensitive personal information is requested, it may be necessary for the exercise and defense of LASACO Assurance PLC's legal rights, where the data subject has provided consent or where we have applied and exemption for insurance purposes.</p>
6	For the purpose of recovering debt.	Contact details, bank account details, collateral information.	<p>Where there is a legitimate business need for debt recovery.</p> <p>Where sensitive personal information is requested, the use described is necessary for establishing,</p>

#	Purpose for collection and processing of data subject’s personal information	Collectable Personal information includes but not limited to the ones set out below	Legal grounds for processing personal information
			defending the legal rights of LASACO Assurance PLC
7	For the purpose of our own information systems management including; management of business processes such as maintaining financial and accounting records, analysis of financial results, internal and external audit requirements, receiving professional advice (e.g. tax or legal advice). We develop policies and security systems to ensure security and effective operation of our systems.	Information about the client including name, residential / office address, email address, telephone number, age and the age of other person(s) included on the policy (family members, business partners, employees). Sensitive personal information about health or beneficiaries' health.	LASACO Assurance PLC Assurance has a legitimate business need to use its client’s personal information to understand its business, monitor performance and maintain appropriate records. Where sensitive personal information is provided, the information is used to determine if an exemption should be applied for Insurance purposes.
8	For research and analytical purposes and to improve our products and services.	Contact details, age, age of other persons included on the policy (e.g. employees, family members, etc.) Information about possessions such as landed property, vehicles, past claims, recent damage, business premises, etc. Information about travel plans including destination, duration of stay, travel dates, etc. Information about nature of commercial enterprise and assets. Sensitive personal information such as health	Research and data analytics are conducted for service improvement purposes in the interest of the data subject. Where sensitive personal information is provided, LASACO Assurance PLC may apply an exemption for insurance purposes where appropriate.
9	Compliance with legal and / or regulatory obligations	Details about the data subject, other related parties, specific product required by the data subject, service or benefit, depending on the nature of the	Necessary for LASACO Assurance PLC Assurance to comply with Legal and Regulatory obligations.
10	Providing improved quality, training and security (for example, with respect to recorded or monitored	Details about our clients and other related parties, product or service having been discussed with the	The use described is required for Legal and Regulatory compliance.

#	Purpose for collection and processing of data subject’s personal information	Collectable Personal information includes but not limited to the ones set out below	Legal grounds for processing personal information
	calls to our contact numbers); technology may include voice analytics	representative during a telephone conversation with LASACO Assurance PLC	
11	Providing marketing information to LASACO Assurance PLC clients including information about other products and services and undertaking customer surveys in accordance with preferences communicated by the data	Name, contact details and marketing preference.	Data subject’s consent.
12	Determination of employability, background check up, academic records verification, and employee surveys and other HR processes requiring personal identifiers.	Name, contact details, academic records, health background / information, Marital status, criminal history record, Biometric details, Academic records, and Gender	To determine employability and to improve employee wellbeing, insurance contracts and regulatory demands.

10. Foreign Transfer of Personal Data

- 10.1.** The transfer of client’s personal information may be to a third party in a foreign country which has adequate data protection laws for data transfer, to be determined by the Attorney General of the Federation and the Data subject shall have the right to be informed of the appropriate safeguards for data protection in the foreign country.
- 10.2.** Where the Attorney General of the Federation has not determined the third party country, the data subject’s personal information may be transferred to a third party in a foreign country in the following circumstances:
 - 10.2.1. Where the data subject has consented to the proposed transfer after having been informed of the possible risks of such transfers
 - 10.2.2. The transfer is for the performance of a contract between the data subject and the data controller
 - 10.2.3. The transfer is for the performance of a contract concluded in the interest of the data subject between the Data Controller and another natural or legal person
 - 10.2.4. The transfer is for public interest
 - 10.2.5. The transfer is for the establishment exercise or defense of legal claim
 - 10.2.6. The transfer is to protect the vital interest of the data subject or other persons, where the data subject is physically or legally incapable of giving consent.

The data subject shall have the right to be informed of the appropriate safeguards for data protection in the foreign country.

Who do we share your personal information with?

We might share your personal information with two types of organization – companies inside the LASACO Group, and other third parties outside the Group. For further details of disclosures, please see below. We won't share any of your personal information other than for the purposes described in this Privacy Policy. If we share anything outside the Group, it'll be kept strictly confidential and will only be used for reasons that we've described.

Disclosures within our group

In order to provide our services your personal information may be shared with other companies in the LASACO Group. Your personal information might be shared for our general business administration, efficiency and accuracy purposes or for the prevention and detection of fraud.

Disclosures to third parties

We also disclose your information to the third parties listed below for the purposes described in this Privacy Policy. This might include:

- Your relatives or, guardians (on your behalf where you are incapacitated or unable) or other people or organizations associated with you such as your insurance broker or your lawyer
- Where you have named an alternative contact (such as a relative) to speak with us on your behalf. Once you have told us your alternative contact, this person will be able to discuss all aspects of your policy (including claims and cancellation) with us and make changes on your behalf.
- An LASACO recommended garage or panel beater or your designated garage or panel beater
- Our insurance partners such as brokers, other insurers, reinsurers or other companies who act as insurance distributors
- Other third parties who assist in the administration of insurance policies such as another Insurance Company if there has been an accident which requires a claim to or from that Insurance Company
- We may share the personal information of any persons named on the policy with third parties to obtain information which may be used by LASACO to inform its risk selection, pricing and underwriting decisions
- Fraud detection agencies and other third parties who operate and maintain fraud detection registers
- The police and other third parties or law enforcement agencies where reasonably necessary for the prevention or detection of crime
- Nigerian Insurance Industry Database
- Our third-party services providers such as IT suppliers, actuaries, auditors, lawyers, marketing agencies, research specialists, document management providers and tax advisers
- Other suppliers, providers of goods and services associated with this insurance and/or to enable us to deal with any claims you make
- Customer satisfaction survey providers
- Financial organizations and advisers
- Overseas assistance companies
- Loss Adjusters
- Emergency Assistance Companies
- Your healthcare practitioner
- Other insurers for the purpose of obtaining a claim contribution where there is another insurance covering the same loss, damage, expense or liability
- Selected third parties in connection with the sale, transfer or disposal of our
- Disclosure of your personal information to a third party outside of the LASACO Group will only be made where the third party has agreed to keep your information strictly confidential and shall only be used for the specific purpose for which we provide it to them.

We may also disclose your personal information to other third parties where:

- We are required or permitted to do so by law or by regulatory bodies such as where there is a court order, statutory obligation or Prudential Regulatory Authority / Financial Conduct Authority; or
- We believe that such disclosure is necessary in order to assist in the prevention or detection of any criminal action (including fraud) or is otherwise in the overriding public interest; or
- Exemptions under the data protection legislation allow us to do so

Some of the recipients and technical solutions set out above may be in other countries outside Nigeria. Where we make a transfer of your personal information outside of Nigeria, in all cases where personal data is transferred to a country which is deemed not to have the same standards of protection for personal data as Nigeria, LASACO will ensure Appropriate Safeguards have been implemented to ensure that your personal information is protected where standards are not the same or similar to those standards within Nigeria. Such steps may include placing the party we are transferring personal information to under contractual obligations to protect it to adequate standards. Occasionally there may also be some circumstances where we are required to transfer your personal information outside of Nigeria and we shall rely on the basis of processing it for being necessary for the performance of your contract; for example, where you have a travel insurance policy and we need to contact you when you are outside Nigeria.

11. Length of time for keeping client personal information

LASACO Assurance PLC shall keep data subject's personal information for as long as reasonably necessary to fulfil the relevant purposes set out in this Policy and in order to comply with our legal and regulatory obligations and subject to the limitation act in force in Nigeria. This includes keeping the data subject's information for a reasonable period of time after the data subject's relationship with LASACO Assurance PLC or its client has ended and particularly for statistical analysis, pricing and risk modelling purposes.

In certain instances, LASACO Assurance PLC will minimize personal data; or de-identify data for use in statistical or analytical activities. This is undertaken in accordance with the data protection laws.

12. Data Subject's Rights

12.1. LASACO Assurance PLC shall disclose the specific purpose for which the information is required before obtaining the information from the data subject and shall inform the data subject of his/her right and method of withdrawal of consent.

12.2. The data subject has the right to request that LASACO Assurance PLC perform certain activities on his/her personal information, such as request for a copy of their personal information, correction of errors on the personal information, a change in the use of their personal information, or delete their personal information. LASACO Assurance PLC is obligated to either carry out the data subject's instructions or explain why it may not be possible - usually because of a legal or regulatory issue.

12.3. Data subject have the following rights in respect of LASACO Assurance PLC's use of their personal information:

12.3.1 Right to access: The data subject has a right to a copy of their personal information as maintained by the Company

12.3.2 Right to rectify: LASACO Assurance PLC takes due care to ensure that the personal information we maintain about data subjects are accurate and complete. However, if a data subject believes the information is inaccurate or incomplete, such data subject has the right to request an amendment.

12.3.3 Right to erase: under certain circumstances, a data subject may ask that LASACO Assurance PLC erase their personal information. For instance, where the personal information collected is no longer necessary for the original purpose or where consent is withdrawn. However, this will need to be balanced against other factors, such as the type of personal information obtained, the original reason for collection, archiving purposes in the public interest, scientific or historical research purposes or statistical purposes, and LASACO Assurance PLC continuous assessment of risk relating to the data subject. There may be some legal and regulatory obligations which prevents LASACO Assurance PLC from complying immediately.

12.3.4 Right to restriction of processing: under certain circumstances, but subject to regulatory requirements, a data subject may be entitled to instruct LASACO Assurance PLC to stop using his/her personal information. This is applicable where:

- a. A data subject contests the accuracy of personal information held by the data controller
- b. Processing of personal data of the data subject is unlawful
- c. The data controller no longer requires the personal data but the data is required by the data subject for establishment, exercise or defense of legal claims
- d. The data subject has objected to processing, pending the verification whether the legal grounds for the data controller override those of the data subject.

12.3.5. Right to data portability: under certain circumstances, data subjects have the right to ask that LASACO Assurance PLC transfers any personal information that they have provided to LASACO Assurance PLC to another third party. Once transferred, the other party will be responsible for safeguarding such personal information.

12.3.6. Right to object to marketing: Data Subject can object to the processing of his/her personal data for the purposes of third party marketing

12.3.7 Right to lodge a complaint: LASACO Assurance PLC data subject has the right to lodge complaints, in the event that there is an objection to the manner in which personal information is being used by the Company. Such complaints can be communicated using contact details provided in our policy documentation. In certain cases, LASACO Assurance PLC may be unable to comply with data subject's requests for reasons such as our own obligations to comply with other legal or regulatory requirements. However, LASACO Assurance PLC will always respond to complaints and where compliance is not feasible, an explanation will be provided.

The right to withdraw consent:

For certain uses of your personal information, we will ask for your consent. Where we do this, you have the right to withdraw your consent to further use of your personal information. Please note in some cases we may not be able to process your insurance if you withdraw your consent.

12.4 The Data Controller shall communicate any rectification or erasure of personal data or restriction to each recipient to whom the data the personal data has been disclosed, unless this proves impossible or involves disproportionate effort.

12.5 In some circumstances, exercising some of these rights will mean LASACO Assurance PLC is unable to continue providing cover under the data subject's insurance policy and may therefore result in cancellation of the policy. The data subject will therefore lose the right to bring any claim or receive any benefit under the policy, including in relation to any event that occurred before the right was exercised, if LASACO Assurance PLC's ability to handle the claim has been prejudiced. Each data subject's policy terms and conditions set out what will occur in the event of a policy cancellation.

12.6 Some of LASACO Assurance PLC's assessment of risks are made automatically by inputting the data subject's personal information into a system, the criteria of which is determined by LASACO Assurance PLC's underwriting team and the decision is then calculated using certain automatic processes rather than manual process via discussions. We make automated decisions in the following situations:

12.6.1 Premium computation: we use the data subject's personal information to determine premium and eligibility.

12.6.2. Fraud and money laundering prevention: LASACO Assurance PLC uses automated anti-fraud and money laundering filters that check against global databases individuals known to have undertaken fraudulent and / or money laundering transactions and will reject those applicants based on outcomes of the automated checks.

12.7. Application assessment: LASACO Assurance PLC may use scoring methods to assess applications, perform identity verification and determine premiums. Examples of information used by LASACO Assurance PLC systems to do this include age, address, lifestyle (e.g. smoking, drinking, exercise routines, etc.) and medical history. If a data subject does not consent to processing sensitive information in this manner, LASACO Assurance PLC may be unable to assess the application or provide a quote. Alternatively, LASACO Assurance PLC may only be able to offer the data subject policies that do not require LASACO Assurance PLC to have that information from the onset. The automated decision making performed by LASACO Assurance PLC systems during the application is proprietary to LASACO Assurance PLC, and the results thereof is not shared with third parties.

12.8. Where the data subject chooses to opt out of automatic decision-making, a formal communication to that effect will suffice. However, in some situations, it may imply that LASACO Assurance PLC will be unable to offer a quote because automated decisions are necessary to price and issue certain policies.

Data subjects can enforce the above rights by sending an email to enforcedatarights@lasacoassurance.com. The Data Controller is obligated to act on the request of the data subject without delay. In the event that the Data Controller does not take action on the request of the Data Subject, the Data Controller shall within one month of receipt of the request, inform the data subject of the reasons why the request has not been actioned.

The exercise of the rights listed above shall be in conformity with constitutionally guaranteed principles of Law for the general protection and enforcement of fundamental rights.

13 Training

13.1. Ultimately, it is LASACO Assurance PLC's employees who are the most important element of LASACO Assurance PLC's commitment. LASACO Assurance PLC's employees are involved in every step of the data lifecycle, including sourcing and receiving personal data, processing it in compliance with laws and regulations, employing safeguards, and establishing the means and schedules of retention and deletion. It is therefore imperative that LASACO Assurance PLC's employees understand their role and be committed to safeguarding personal data.

13.2. LASACO Assurance PLC designs its training programme to be relevant, focused on the individual and also focused on concrete risks. LASACO Assurance PLC runs regular data protection and information security awareness campaigns. The Company also share with its employees other knowledge resources on data protection and privacy topics, including guidance on ways that they can better protect and safeguard personal privacy.

- 13.3.** It is important that LASACO Assurance PLC’s employees understand the seriousness of protecting personal data and respecting privacy rights with the ability to relate this back to the risks and consequences from an individual perspective. Through LASACO Assurance PLC’s efforts, it remains committed to realize its goal to ensure its employees and business partners understand their respective roles and responsibilities for data protection compliance.

14 Marketing

- 14.1** The data subject reserves the right to the use of his/her personal information for marketing and LASACO Assurance PLC shall obtain the consent of the client prior to using such information for marketing purpose in specific cases not covered under this policy.
- 14.2** LASACO Assurance PLC shall be committed to only send its data subjects insurance marketing communications that meets the needs and behaviours of the data subject. Where the data subject chooses to unsubscribe from our mailing lists, such can be achieved at any time by following the unsubscribe instructions that appear in all marketing emails or contact LASACO Assurance PLC via the details set out in this policy documents.
- 14.3** Periodically, LASACO Assurance PLC may run specific marketing campaigns through social media and digital advertising that the data subject may see which are based on general demographics and interests. Individual personal information is not used for these campaigns. Should a data subject not want to see such campaigns, the data subject shall be responsible for adjusting preference settings within the specific social media platform including cookie browser settings
- 14.4** LASACO Assurance PLC may retain any data provided on its website and mobile app for a reasonable period, subject to the client’s prior approval, even if the contract is not consummated and such information may be used to make enquiry on why the contract is not consummated.

15. Audit and Enforcement of the Data Protection Policy

- 15.1.** The Internal Audit Department of the Company shall conduct the audit of the privacy and data protection practice, in accordance with the extant Data protection regulation and the Data Protection Officer shall be responsible for monitoring compliance with the regulation.

16. Remedies for Violation of Data Protection Policy and the Timeframe for Remedy

- 16.1.** In the event of violation of this policy, the data controller shall within 15 days redress the violation. Where the violation pertains to the disclosure of the data subject’s information without his/her consent, such information shall be retracted immediately and confirmation of the retraction sent to the data subject within 48 hours of the redress.

Where the violation is caused by any representative of the data controller, such representative shall be subject to appropriate sanction.

17. Download LASACO Assurance PLC data privacy policy

To download a full copy of this policy in PDF format, please visit:

www.lasacoassurance.com/privacy-policy/

18. Contact details of the Data Controller and Data Protection Officer

LASACO Assurance PLC's Data Controller and Data Protection Officer can be contacted via the following details:

LASACO Assurance PLC Assurance Company Limited

Plot 16, Acme Road, Off Agidingbi Road, Ogba, Ikeja.

Lagos. dataprivacy@lasacoassurance.com

You have a right to complain to the Information Regulator if you think that your information has been misused.

The contact details are:

National Information Technology Development Agency

Tel: +234929220263, +2348168401851, +2347052420189

Website: www.nitda.gov.ng