

Privacy Policy

At **Great Nigeria Insurance Plc**, the privacy of our Data Subjects' Personal Data is paramount. In view of this, we have developed this Privacy Policy to help you understand how we may process any personal information obtained from you.

This Privacy Policy therefore establishes our commitment to your privacy on all our platforms.

1. Consent

By providing your personal information to us, you have signified your acceptance of our Privacy Policy and agree that we may collect, use and disclose your personal information for specified purposes as described in this Privacy Policy.

2. What Personal Data do we collect?

Generally, we may process the following information:

1. **Personal Identification Information** – When filling out a proposal form, we will request for your full name, date of birth, age, nationality, gender, signature, utility bills, photographs, phone number, home address, and email address.
2. **Formal Identification Information** – These include National Identification Number (NIN), International Passport details, Drivers' License details, Voter's card details.
3. **Online Identifiers** – Browser fingerprint, Operating System (OS), browser name and version, and/or personal IP addresses.
4. **Financial Information** – We may process information related to payments that Data Subjects make or receive in the context of an insurance policy or claim. These include information such as Bank Verification Number (BVN) and information obtained from credit reference agencies.
5. **Contractual Information** – We may process details about the policies a data subject holds and with whom the data subject holds them.
6. **Health Information** – We may process medical related issues relevant to a policy the data subject holds or a claim the data subject has made.

We also collect personal data in the following ways:

- **Information from our social media sites:** We may collect information through your engagement with us on our social media sites (Facebook, Instagram, LinkedIn, Twitter). This includes your replies to our posts, your comments, enquiries and support messages. However, we will only ask for information required to help us be of service to you.
- **Other information we collect related to your use of our site or services:** We may collect additional information from or about you when you contact us with an enquiry, request a quote or take advantage of a promotion.
- **Job application/Employment relationship:** When you apply for a job with us, we will request your personal data. As part of your application, you will be asked to provide your express consent to our use of this information to assess your application and subsequently for the establishment, management and conclusion of your employment relationship with us.

We do not directly collect personal information from minors. Where they are named as beneficiary of a policy, next of kin for employees, specific information needed for record purposes is obtained and archived till the need for usage arises.

3. Why Do We Collect your Personal Data?

Great Nigeria Insurance Plc will obtain your consent before using and processing your data for one or more specific purposes made known to you. We collect your personal data to provide you an efficient and secure customer experience. Specifically, we may use your personal data for several reasons such as:

- Underwriting our business with you
- Managing your claims
- Assessment, improvement and development of our services
- Compliance with legal and regulatory obligation and protection ourselves and you against fraud
- Assessment of your employability with us
- Administration of employee benefits-related purposes
- To market our products and services to you. We will not send unsolicited marketing communications to you by SMS or email if you have not opted in to receive them. Additionally, you can withdraw your consent at any time and free of charge.

3. What are our Collection Methods?

Typically, we receive personal data directly from Data Subjects. We may also receive personal data from third parties.

The following are methods through which we may collect personal information:

Direct collection:

- Know Your Customer (KYC) forms
- Claim forms
- Enquiry and Quote forms
- Recorded telephone conversations
- Digital touch points
- Electronics means (email, website, app)
- Visitors register
- Job application documentation
- Employee engagement biodata forms

Third party's data collection source:

- Individuals nominated and authorised by you to engage us on your behalf. A copy of your consent given to the third party to transfer your data to **GNI** shall suffice for our processing
- Credit reference agencies.
- Publicly available sources e.g. newspapers, websites
- Family members in the event of incapacitation or death of the insured for the purpose of claims payment

4. How We Use Cookies

Cookies are small files placed on your device's browser that enables the website to identify your device as you view different pages. We use cookies to track browsing history of visitors to improve their experience.

Our website provides visitors an option to accept the use of cookies during their browsing session. Consent is received before any form of data processing can be performed. Every consent given by a data subject is kept secured as evidence that consent was received.

Certain aspects of our website are only available through the use of cookies, so your use of our website may be limited or not possible if you choose to disable or decline cookies.

5. Record Retention Period

We retain Personal Data for ten (10) years after your relationship with us has ended in order to fulfil the relevant purposes set out in this policy and to comply with our legal and regulatory obligations. We may retain Personal Data for longer periods if it is in our legitimate business interests and required to comply with applicable laws. We will continue to use and disclose such Personal Data in accordance with this Privacy Policy.

6. Sharing your Personal Data

We may share your Personal Data or other information about you with others for the following reasons:

- With other companies that provide services to us: We may share Personal Data with third-party service providers that perform services and functions at our direction and on our behalf.
- With other third parties for our business purposes or as permitted or required by law: We may share information about you with other parties for our business purposes or as permitted or required by law, including:
 - i. if we need to do so to comply with a law, legal process or regulations;
 - ii. with credit agencies and data processors for credit reference checks and anti-fraud and compliance purposes;
 - iii. to investigate violations of or enforce a user agreement or other legal terms applicable to any service;
 - iv. to companies that we plan to merge with or be acquired by; and
 - v. to support our audit, compliance, and corporate governance functions.
- With your consent: We also will share your Personal Data and other information with your consent or direction.

7. What Are Your Rights?

I. Requests to Access, Rectify or Erase

1. Access Request

You have the right to ask us whether we hold any Personal Data relating to you and, if we do, to be provided with a copy of that Personal Data in electronic form, unless you want to receive it in another way (for example, a paper copy). In addition, you can ask us for information on how we use your Personal Data, who we share it with, how long we keep it, where it is stored, and other information to help you understand how we use it.

2. Rectification Request

You have the right to ask us to correct your Personal Data (including by means of providing a supplementary statement) if it is inaccurate and to have incomplete Personal Data updated without undue delay. If we cannot correct the Personal Data, we include a note on our files regarding your request to correct your Personal Data.

3. Erasure Request

You have the right to ask us to erase your Personal Data if:

- Your Personal Data are no longer necessary for the purpose(s) they were collected for
- Your Personal Data have been unlawfully processed
- Your Personal Data must be erased to comply with a regulation
- You withdraw your consent for the processing of the Personal Data (and if this is the only basis on which we are processing your Personal Data)
- You object to processing that is based on our legitimate interests, provided there are no overriding legitimate grounds for continued processing, or
- You object to processing for direct marketing purposes.

If we have made the Personal Data concerned public, we will also take reasonable steps to inform other data controllers processing the data so they can seek to erase links to or copies of your Personal Data.

We may refuse to act on your request to erase your Personal Data if the processing of your Personal Data is necessary:

- To exercise our right of freedom of expression and information
- To comply with the NDPR and relevant Nigerian laws
- For the performance of a task carried out in the public interest or to exercise official authority vested in us
- To establish, exercise or defend legal claims.

In these cases, we can restrict the processing instead of erasing your Personal Data if requested to do so by you.

II. Requests to Object

You have the right to object at any time to the processing of your Personal Data if we process it based on our legitimate interests. This includes any so-called “profiling”. Our privacy notice informs you when we rely on legitimate interests to process your Personal Data. In these cases, we will stop processing your Personal Data unless we can demonstrate compelling legitimate reasons for continuing the processing. We may reject your request if the processing of your Personal Data is needed to establish, exercise or defend legal claims. You have the right to object at any time if we process your Personal Data for direct marketing purposes. You may also object at any time to profiling supporting our direct marketing. In such cases, we will stop processing your Personal Data when we receive your objection.

III. Requests to Restrict

You have the right to ask us to restrict the processing of your Personal Data if:

- You contest the accuracy of your Personal Data and we are in the process of verifying the Personal Data we hold
- The processing is unlawful and you do not want us to erase your Personal Data

- We no longer need your Personal Data for the original purpose(s) of processing, but you need them to establish, exercise or defend legal claims and you do not want us to delete the Personal Data as a result, or
- You have objected to processing carried out because of our legitimate interests while we verify if our legitimate grounds override yours.

If processing is restricted, we may process your Personal Data (except for storage purposes), only:

- If you have given us your consent
- For establishing, exercising or defending legal claims
- For protecting the rights of another natural or legal person, or
- For reasons of important public interest as defined under the GDPR and relevant Nigerian laws

Once processing is restricted following your request, we will inform you before we lift the restriction.

IV. Requests for Portability

You have the right to ask that we transfer any personal information that you have provided to us to another third party. Once transferred, the other party will be responsible for safeguarding such personal information.

Even if you request the portability of your Personal Data, you retain your right to also request their erasure.

V. Requests to Object to Automated Decisions

Generally, you have the right to object to any decision producing a legal effect concerning you or which otherwise significantly affects you if this is based solely on the automated processing of your Personal Data. This includes automated decisions based on profiling.

We may refuse your request if the decision in question is:

- Necessary to enter into a contract with you, or for the performance of your contract with us
- Permitted by regulations, or
- Based on your explicit consent.

We will only make decisions relying solely on automated processing that involve your sensitive Personal Data if you have given your explicit consent or the processing is necessary for reasons of substantial public interest, based on the GDPR and relevant laws.

8. How Do We Protect Your Personal Data?

We maintain technical, physical, and administrative security measures designed to provide reasonable protection for your Personal Data against loss, misuse, unauthorised access, disclosure, and alteration. The security measures include data encryption, physical access controls to our premises, CCTV cameras for public safety and quality control as well as information access authorisation controls. While we are dedicated to securing our systems and services, you are responsible for securing and maintaining the privacy of your password(s) and account/profile registration information and verifying that the Personal Data we maintain about you is accurate and current.

We will inform you of any breaches which may affect your Personal Data.

9. Remedies for Violation and Timeframe for Remedy

In the event of violation of this policy, our Data Protection Officer shall within 7 days redress the violation. Where the violation pertains to the disclosure of your Personal Data without your consent, such information shall be retracted immediately, and confirmation of the retraction sent to you within 48 hours of the redress.

10. Contact Us

If you have any general questions or concerns about this Privacy Policy or the way in which we handle your Personal Data, kindly contact us via the details below:

GREAT NIGERIA INSURANCE PLC

8, Omo Osagie Street

Ikoyi, Lagos

Email: dpo@greatnigeriaplc.com

Phone Number: +234-802- 388-7558