

Data Protection Policy

DPP

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CONFIDENTIAL

FIN INSURANCE DATA PRIVACY POLICY

Our Privacy Notice

At FIN Insurance, we recognise the importance of privacy and security of our customers' personal information. We value the trust you place in us to protect your personal information and respect your right to privacy. While new technologies have dramatically changed the way information is gathered, used and stored, preserving customer trust and the privacy of personal information at FIN Insurance remains a core objective. We believe it is important to make it clear to our customers how information is being collected, used and shared at FIN Insurance, the benefits such use provides, and the protections put in place against unauthorised access and use. We respect your privacy and the confidentiality of your personal information, and we appreciate the opportunity to do business with you.

1. Our Privacy Principles

We will only collect, transfer, process and store your personal information with your express permission unless legally required to do so and will only use such information for the lawful purpose for which it is required.

- We will disclose the specific purpose for which we use, request and store your personal information.
- We will also keep a record of that personal information and the specific purpose for which we collect it.
- We will not use your personal information for any other purpose, other than that which we disclosed to you, unless you give us your express consent to do so, or unless we are permitted to do so by law.

2. Information we collect

2.1 We may collect information from you when you register to purchase any of our products on our channels. We may collect your name, e-mail address, phone number, date of birth, gender, residential address, ID number, account number and or BVN.

2.2 We may collect and combine information when you use our mobile application services including information you provide to us, device IDs, cookies, and other signals, including information obtained from third parties, to associate accounts and/or devices with you. We collect information about you when we receive it from third parties.

2.3 We collect information from devices such as mobile phones and tablets about how you interact with our services and those of our third-party partners

and information that allows us to recognise and associate your activity across devices and services. This information includes device specific identifiers and information such as IP address, cookie information, mobile device and advertising identifiers, browser version, operating system type and version, mobile network information, device settings, and software data.

3. How do we use the information we collect?

3.1 Services

We use your data that we have collected to authenticate you and authorise access to our services on our channels.

3.2 Communication

We will contact you through email, short message services (SMS), phone call, and other ways through our services, including text messages and push notifications. We will send you messages about the availability of our services, security, or other service-related issues. We also send messages about how to use the services and network updates.

3.3 Advertising

We serve you tailored advertisements on our services. We target advertisements to our customers through a variety of ad networks and exchanges, using data from advertising technologies on our services and information from advertising partners, publishers and data aggregators.

3.4 Marketing

We use data and content about our customers for invitations, promotions and communications solely for promoting our services.

3.5 Customer Support

We use the data needed to investigate, respond to and resolve complaints and service issues.

3.6 Security, Fraud and Investigations

We use your data for security purposes or to investigate possible fraud or other violations of our User Agreement or this Privacy Policy and/or attempts to harm our customers and/or visitors.

4. How do we secure your information?

Protecting our systems and our users' information is paramount to ensuring customers of our brand, websites, apps, advertising services, products, services or technologies ("Services") enjoy a secure experience and we maintain our users' trust. We have taken the following measures to protect your information:

4.1 Security Safeguards

FIN Insurance has technical, administrative and physical safeguards in place to help protect against unauthorised access, use or disclosure of customer information we collect or store.

4.2 Security of Information Submission and Access

We implement a variety of security measures to maintain the safety of your personal information when you enter, submit, or access your personal information.

4.3 Secure Transmission

We offer the use of a secure transmission, processing and storage services using standardised security safeguards.

4.4 Security of sensitive information

All supplied sensitive/credit information for online engagements with us is encrypted via transaction layer security (TLS) technology during transmission to avoid misuse of your data. Card Number (PAN) and expiry date of any credit and prepaid cards used when purchasing insurance policies from our platforms are captured directly on the payment gateway of our accredited payment partners and are tokenized.

Your personal information may be accessible by those authorized with special access rights to such systems and are required to keep the information confidential. Information such as PINs and passwords are not accessible to our authorized personnel.

No method of transmission over the internet, or method of electronic storage, is 100% secure. Therefore, we cannot guarantee its absolute security. If you have any questions about security, you can contact us at info@finsurance.com.ng

5. How (and with whom) do we share your information?

When you use or interact with our services, you consent to the data processing, sharing, transferring and uses of your information as outlined in this Privacy Policy. Fin Insurance shall endeavour to comply with all applicable data protection and privacy regulations including the Nigeria Data Protection Regulations (NDPR) by NITDA.

Data Protection Policy

5.1 To provide you with our services, your personal information may be transferred to countries other than your own to process and store data in accordance with our Privacy Policy and to provide you with products and services. We may transfer your data to partners for outsourced data processing undertaken on FIN Insurance's behalf.

5.2 We share information concerning your transactions and experience within us, which includes our technology and securities partners. This sharing of information is intended only to facilitate the servicing of our customers' accounts and to offer insurance products and services we believe would be beneficial to our customers.

5.3 Under all sharing arrangements, FIN Insurance. requires its service providers to keep such information under strict privacy regulations and prohibits them from disclosing such information to anyone for any other purpose.

5.4 We do not, and will not, share customer information with non-financial companies for the purpose of allowing them to market their products and services to our customers. We do not disclose any non-public personal information about our customers to any other third parties, except as permitted or required by law.

5.5 By using our products and services you consent to us transferring your information to countries outside your local jurisdiction, if necessary, for FIN Insurance's legitimate business purposes as defined in our Privacy Policy. We are committed to ensuring your information is protected and apply security safeguards in accordance with applicable law.

6. What choices do you have about your information?

6.1 Data Retention

We keep most of your personal data for as long as your policy with us is active. We retain the personal data you provide while your policy is in existence or as needed to provide you with our services.

6.2 Rights to Access and Control Your Personal Data

You can access your personal data from our services when you follow our procedures on data subject requests. You can always modify or update your personal data using the applicable menus in the app.

When you wish to deactivate yourself from our channels, you are required to send a request to finlega@finsurance.com.ng. FIN Insurance. shall contact you within ten days to validate the request for processing.

6.3 Account Closure

We retain your personal data even after you have closed your policy/account if reasonably necessary to comply with our legal obligations (including law enforcement requests), meet regulatory requirements, resolve disputes, maintain security and prevent fraud.

RECRUITMENT PRIVACY POLICY

FIN Insurance Company Limited – Recruitment Data Collection Privacy policy

This privacy policy is designed to detail how FIN Insurance handles data collection and data usage of job candidates for FIN Insurance declared vacancies.

Candidates

FIN Insurance may gather personally identifiable data from candidates who submit CVs physically or on our website. We may gather data such as nationality, ID number, contact numbers, date of birth, gender, language, placement status, email, skype ID, address, education, industry, information about a candidate's current employer (including the period of work, currency and pay, and benefits), desired pay, expected salary and benefits, reason for seeking employment, and ability to relocate. We also may collect data on a candidate's race and criminal record in order to comply with legal obligations and internal policies, such as those relating to diversity and anti-discrimination. This information goes through internal recruitment system that our recruiters use.

Cookie policy

FIN Insurance uses multiple cookies to optimise our services. Cookies remember information about you, making your usage of our website easier. The main purpose of the majority of these cookies is for advertising/targeting users. These cookies enable link-based advertisements, content sharing and linking services, and online video advertising. Our cookies gather data such as audience data to enable targeting of advertising based on visitor profiling, and web widgets embedded by site owners into pages or other content to enable visitors to create and share links to the content across social networks. While cookies are used by default, they may be disabled. However, this may prevent you from using the full range of our available services.

Use of Third Party Sub-processors

We make use of a variety of third party websites hosting services to help run our Fin Insurance web pages, some of which may gather user data. The data these third-party sites gather enable us and these websites to greater facilitate user experience. These sites may gather personally identifiable data such as a user's name, email address, phone number, mobile provider, country of origin, operating system, company name, billing address, and postal address where necessary. Other data collected is used as log data, such as a user's IP address, browser type, browser version, the pages of our service that are visited, the time and date of visit, the time spent on those pages and other statistics.

Disclosure of personal information

We do not routinely disclose personal information to other organisations unless:

- required by law; If we are under a duty to disclose or share your personal data to comply with any legal obligation
- to prevent and detect fraud or crime;
- In response to a subpoena, warrant or court order, or as may be required by law; and
- In response to lawful requests by public authorities, including to meet national security or law enforcement requirements
- use or disclosure is permitted by this policy;
- we believe it is necessary to provide you with a product or service which you have requested or are contracted to;
- to protect the rights, property or personal safety of any member of the public or a customer of FIN Insurance or the interests of FIN Insurance
- some or all the assets or operations of FIN Insurance are or may be transferred to another party as part of the sale of some or all of our business; or
- you give your consent.

We may also share non-personal, de-identified and aggregated information for research or promotional purposes. Except as set out in this policy, we do not sell or trade personal information to third parties or allow such third parties to use that personal information.

Security of personal information

We will endeavour to take all reasonable steps to keep any information we hold about you secure, whether electronically or in hard-copy, and to keep this information accurate and up to date. We also require our employees and data processors to respect the confidentiality of any personal information held by FIN Insurance.

The transmission of information via the Internet or email is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of data while you are transmitting it to our site; any such transmission is at your own risk. Once we have received your personal data, we will use strict procedures and security features to prevent unauthorised access. We aim to achieve industry best practice in the security of personal information we hold. It is our policy to destroy personal information once there is no longer a legal or business need for us to retain it.

Access to information

We will provide access to personal information upon request by an individual, except in the limited circumstances in which it is permitted for us to withhold this information (for instance, where granting access would infringe another person's privacy).

When you make a request to access personal information, we will require you to provide some form of identification (such as a driver's license or passport) so we can

verify that you are the person to whom the information relates. In some cases, we may also request an administrative fee to cover the cost of access.

If at any time you want to know what personal information we hold about you, you may contact us in writing or by email.

Corrections and concerns

If you believe that information we hold about you is incorrect or out of date, or if you have concerns about how we are handling your personal information, please contact us and we will try to resolve those concerns.

If you wish to have your personal information deleted, please let us know and we will take reasonable steps to delete it (unless we need to keep it for legal, auditing or internal risk management reasons). If we become aware of any ongoing concerns or problems concerning our privacy practices, we will take these issues seriously and work to address these concerns. If you have any further queries relating to our privacy policy, or you have a problem or complaint, please contact our Data Protection Officer.

Effect of policy

FIN Insurance operates in a dynamic business environment. Over time, aspects of our business may change as we respond to changing market conditions. This may require our policies to be reviewed and revised. FIN Insurance reserves the right to change its privacy policy at any time and notify you by posting an updated version of the policy on this website.

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