



DATA PRIVACY POLICY

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DATA PRIVACY POLICY

COMMITMENT TO TRANSPARENCY - A commitment to transparency based on strict respect for Atiat Insurance Brokers' code of professional ethics.

Atiat Insurance Brokers Limited (“**the Company**”, “**we**” or “**us**”) is a company duly incorporated under the laws of the Federal Republic of Nigeria and licensed by the National Insurance Commission (NAICOM) to transact in all classes of insurance. We are also a key member of The Nigeria Council of Registered Insurance Brokers (NCRIB), the umbrella body for Insurance Brokers in Nigeria.

We are a data controller committed to protecting and respecting your privacy. This Privacy Policy, in compliance with the applicable data protection laws in Nigeria, details our process for the collection, use, safeguarding and disclosure of your personal data when you use the Service. 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 numbers, 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 (hereinafter collectively referred to as “Personal Data”).

Personal data may be received from third parties or collected using our website(s) and other digital channels. In line with this policy, we ensure that we gather, store and handle data fairly, transparently and with respect towards individual rights. As a result of government regulations, new technologies, or other developments in data protection laws or privacy generally, you should check the Atiat Insurance Brokers Limited website periodically to view the most up-to-date privacy policy.

We use the Personal Data we collect to provide and improve the Service. By using the Service, our website and any related digital channels, sites and tools, you consent to the collection and use of your Personal Data in accordance with this Privacy Policy. If you do not agree, you may withdraw your consent at any time but note that the Company will not be able to provide you with the Service.

Please read this Privacy Policy carefully as this sets out the basis on which any personal data, we collect from you, or that you provide to us, will be processed by us.

Interpretation and Definitions

Interpretation

The words of which the initial letter is capitalized shall have the meanings defined under the following paragraphs. The following definitions shall have the same meaning regardless of whether they appear in singular or plural.

Definitions

In this Privacy Policy:

"Country" refers to Nigeria;

"Service" refers to the use of any service or product offered by the Company;

"You" refers to the user of the Service of the Company. Your shall be construed accordingly.

Our Privacy Principles

- Personal Data you provide is processed fairly, lawfully and in a transparent manner.
- Personal Data you provide is collected for a specific purpose and is not processed in away which is incompatible with the purpose for which we collected it.
- Your Personal Data is adequate, relevant and limited to what is necessary in relation to the purposes for which it is processed.
- Your Personal Data is kept accurate and, where necessary kept up to date.
- Your Personal Data is kept no longer than is necessary for the purposes for which thePersonal Data is processed.
- We will take appropriate steps to keep your Personal Data secure.
- Your Personal Data is processed in accordance with your rights.
- We will only transfer your Personal Data to the selected underwriter agreed by both parties where the need arises or the area where we have taken the required steps to ensure that your Personal Data is protected. Such steps may include placing the party we aretransferring information to under contractual obligations to protect it to adequate standards.
- Atiat Insurance Brokers will not sell your Personal Data and we also will not permit thesale of customer data by any companies who provide a service to us.

How do we collect your Personal Data?

- We collect Personal Data directly from you: via proposal forms, 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 our telephone calls with you, which may be recorded.
- When you provide your details to us either online or offline.
- Via live chat, chatbot and profilers.



We also collect your Personal Data 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 informationrelevant 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 AXA Mansard to inform its risk selection, pricing and underwriting decisions

What Personal Data do we collect?

The information that we collect will depend on our relationship with you. Where other people are named on your policy, we may ask you to provide the information below in relation to those people too, if this is relevant to your insurance. We may collect the following information about you:

- Personal Data contact details such as name, email address, home/office address and telephone number.
- details of any other persons included on the policy where they are named on your policy and their relationship to you as the policyholder.
- identification information such as your date of birth, national identity number, Bank verification number including other identification number from your passport, driving license and other valid means of identification.
- financial information such as bank details
- information relevant to your insurance policy such as details about your vehicle, property, previous policies or claims, recent damage, information about your travel plans, destination, planned activities and dates of travel.
- information relevant to your claim or your involvement in the matter giving rise to a claim.
- information about the nature of your business and commercial assets

How do we use your Personal Data?

Under the applicable data protection laws, we need a reason to use and process your Personal Data and this is called a legal ground. We have set out below the main reasons why we process your Personal Data as well as the applicable circumstances:

- Processing is necessary 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 these circumstances, if you do not provide such information, we will be unable to offer you a policy or process your claim.
- Where we have a legal or regulatory obligation to use such Personal Data, 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 Nigerian Data Protection Commission (NDPC) mandate 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 the Company and any authority, regulator, or enforcement agency; policies (including our policies), good practice, government sanctions or embargoes, reporting requirements under financial transactions legislation and demands or requests of any authority, regulator, tribunal, enforcement agencies including but not limited to the Nigerian Financial Intelligence Unit (“NFIU”) and the Economic and Financial Crimes Commission (“EFCC”), or exchange bodies;
- Where we need to use your Personal Data 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 Data 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 Personal Data as an essential part of the insurance cover, for example health data.
- Where you have provided your consent to our use of your Personal Data. We will usually only ask for your consent in relation to processing your sensitive Personal Data (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 Data. 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 Data about a third party, we may ask you to confirm and provide proof that the third party has provided his or her consent for you to act on their behalf.
- Where we have appropriate legitimate business needs to use your Personal Data 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.

Who do we share your Personal Data with?

We share your Personal Data with selected insurance companies and other third parties listed below. For further details of disclosures, please see below. We will not share any of

your Personal Data other than for the purposes described in this Privacy Policy. If we share your Personal Data, it will be kept strictly confidential and will only be used for the reasons that we have described.

Disclosures within our group

To provide our services your personal information may be shared with selected insurance companies and other third parties. Your personal information might be shared for our general business administration, efficiency, and accuracy purposes or the prevention and detection of fraud.

Disclosures to third parties

We also disclose your Personal Data 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.
- A recommended garage or panel beater or your designated garage or panel beater.
- Our insurance partners such as insurance companies, reinsurers or other companies who function 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 Data of any persons named on the policy with third parties to obtain information which may be used by AIB 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.
- 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 products.

Your consent will always be sought to the extent possible before disclosure of your Personal Data to the third parties listed above. is made.

Disclosure of your Personal Data to a third party outside of the Company 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 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 relevant data protection legislation or applicable Nigerian laws allow us to do so.

How long do we keep records for?

We keep your Personal Data for as long as reasonably necessary to fulfil the relevant purposes set out in this Privacy Policy and to comply with our legal and regulatory obligations. The length of time we retain Personal Data for depends on the purposes for which we collect and use it and/or as required to comply with applicable laws and to establish, exercise or defend our legal rights.

Your Rights

You can ask us to do various things with your Personal Data. For example, at any time you can ask us for a copy of your Personal Data, ask us to correct mistakes, change the way we use your information, or even delete it. We will either do what you have asked or explain why we cannot

– usually because of a legal or regulatory issue.

You have the following rights in relation to our use of your Personal Data.

The right to access your Personal Data:

You are entitled to a copy of the Personal Data we hold about you and certain details of how we use it. Your Personal Data will usually be provided to you in writing, unless otherwise requested. We may charge you a reasonable fee to cover the cost.

The right to rectification:

We take reasonable steps to ensure that the Personal Data we hold about you is accurate and complete. However, if you do not believe this is the case, please contact us by using the details shown in your documentation and you can ask us to update or amend it.

The right to erasure:

In certain circumstances, you have the right to ask us to erase your Personal Data, for example where the Personal Data we collected is no longer necessary for the original purpose or where you withdraw your consent. However, this will need to be balanced against other factors, for example according to the type of Personal Data we hold about you and why we have collected it, there may be some legal and regulatory obligations which mean we cannot comply with your request.

Right to restriction of processing:

In certain circumstances, you are entitled to ask us to stop using your Personal Data, for example where you think that the Personal Data, we hold about you may be inaccurate or where you think that we no longer need to process your Personal Data.

Right to data portability:

In certain circumstances, you have the right to ask that we transfer any Personal Data that you have provided to us to another third party of your choice. Once transferred, the other party will be responsible for looking after your Personal Data.

The right to withdraw consent:

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



Changing and accessing your Personal Data:

To the extent required by applicable law, you may be able to request that we inform you about the Personal Data we maintain about you and, where appropriate, withdraw your consent for certain data processing activity and/or request that we update, correct, delete, and/or stop processing your Personal Data. We will respond to your access requests within the period specified by relevant legislation and make all required updates and changes within the time specified by applicable law and as required by law.

When permitted by law, we may charge an appropriate fee to cover the costs of responding to the request. Where the timeline specified in an applicable law cannot be met, we will communicate same to you and take steps to notify you where we require an extension.

How we protect Personal Data:

We take reasonable measures to protect Personal Data from unauthorized access, disclosure, alteration, or destruction to ensure that Personal Data is accurate and up to date

as appropriate because:

- We have put in place strict measures and technologies to prevent fraud and intrusion.
- Our employees are trained in data protection and security to respect and preserve confidentiality, integrity and availability of information held by us.

Breach/ Privacy Violation

In the event of a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to, personal information, we shall within 72 (seventy-two) hours of having knowledge of such breach report the details of the breach to the NDPC. Furthermore, we shall within 7 (seven) days of having knowledge of the occurrence of such breach take steps to inform you of the breach incident, the risk to your rights and freedoms resulting from such breach and any course of action to remedy said breach.

Marketing

We may share information with our other entities or affiliates in order to inform you of other products and services that may be of interest to you or members of your family.

We would like to keep you informed, from time to time about relevant products and services. We may do this by mail, email, telephone or other electronic methods such as text message. From time to time, we may run specific marketing campaigns through social media and digital advertising that you may see which are based on general demographics and interests.

Individual personal information is not used for these campaigns. If you do not want to see any campaigns, then you will need to adjust your preferences within social media settings and your cookie browser settings.

We may also share information that we collect about you for marketing within the Company. If you do not want to receive such promotional materials from us, you can opt out at any time by sending an email to info@atiatinsurancebrokers.com.

Please note that we may retain any data provided to us on our websites for a limited period, even if you do not complete your quote. The information may be used for us to better understand your needs.



COOKIE POLICY

This Cookie Policy describes what cookies are, how the Company uses them on their digital channels and how to disable them.

1. What Are Cookies?

Cookies are small data files saved on your phone, tablet or computer when you visit a website.

2. How we Use Cookies

We use Cookies, web beacons and similar technologies, such as tracking URLs, to identify users on www.atiatinsurancebrokers.com (the “Site”) and collect information about how you or others access or engage with our Services, content, emails, and ads displayed on or off our Services. Cookies may also be used by other third-party websites where you access third-party links. Cookies enable us to make your user experience easier, customise our features and services, content and advertising; help you ensure that your account security is not compromised, mitigate risk and prevent fraud; and promote trust and safety.

Cookies allow our servers to remember your account log-in information when you visit the Site, IP addresses, date and time of visits, monitor traffic and prevent fraudulent activities.

3. The Types of Cookies We Use

We use the following cookies:

- **Strictly Necessary Cookies:** these are cookies that are required for the operation of our Site. They include, for example, cookies that enable you to visit the Site and make use of any of the features and services.
- **Analytical or performance Cookies:** these allow us to recognize and count the number of users or visits to the Site and to see how users and visitors move around the Site when it is being used. This helps us to improve the way the Site works by ensuring that users can easily access our services and features.
- **Functionality Cookies:** these are used to recognize you when you return to the Site. This enables us to personalize your experience and remember your preferences and the choices you make on the Site.
- **Targeting Cookies:** these cookies record your visit to the Site, the pages you have visited and the links you have followed.

4. How to Disable Cookies

Most browsers automatically accept Cookies, but your browser may have settings that enable you to decline or delete Cookies on your device or alert you when a site wants to place a cookie on your computer. Please note that if you decline Cookies, you may not be able to sign in, customize, or use some of the interactive features of our Services, as some of our Services require Cookies to operate.

5. Changes to this Cookie Policy

As this Cookie Policy is part of our Data Privacy Policy, we may update it at any time as described in our

Data Privacy Policy. Please review this Cookie Policy regularly to be informed of any updates.

Our Contact Information

If you would like any more information about the way we use your information, or if you wish to exercise the rights listed above, please contact us using the details below:

The Managing Director

Atiat Insurance Brokers Limited.
7B, Kafayat Abdulrasaq Street,
Lekki Phase 1, Lagos, Nigeria.

Customer Care Hotline: 08023050209

General Enquiries: 08023050209

Email: info@atiatinsurancebrokers.com

You have a right to complain to the Information Regulator if you think that your information has been misused. The contact details are:

Nigerian Data Protection Commission

Tel: +234 (0) 916 061 5551

Email:

info@ndpc.gov.ng

Website:

www.ndpc.gov.ng/

Our Commitments

Check out our data privacy declaration to see how we oversee data safety and protect your privacy every day.



FOLLOW US

WEBSITE: <https://www.atiatinsurancebrokers.com/>

FACEBOOK:

<https://web.facebook.com/profile.php?id=61552852576762>

INSTAGRAM: https://www.instagram.com/atiat_insurance_brokers/

TWITTER: <https://twitter.com/atiatinsurance>

LINKEDIN: <https://www.linkedin.com/company/18831013/admin/feed/posts/>

