PRIVACY POLICY

1. INTRODUCTION

Coronation Life Assurance ("the Company") places the highest priority on protecting personal data and ensuring confidentiality.

Guided by the Nigeria Data Protection Act (NDPA), GAID 2025 Implementation Requirements, and other applicable laws and regulatory standards, the Company adopts strict measures for the responsible collection, use, storage, processing, and disclosure of personal data in line with industry best practices and insurance regulatory obligations.

This Privacy Notice explains how we collect, use, share, protect, and process personal data while providing insurance products and services.

2. SCOPE OF PROCESSING

We process personal data in relation to:
2.1 Insurance policy underwriting and onboarding
2.2 Claims processing and settlement
2.3 Broker and agent interactions
2.4 Customer service and engagement
2.5 Regulatory and compliance obligations

3. CONSENT TO PROCESSING OF PERSONAL DATA

By providing your personal data to Coronation Life Assurance, you acknowledge that you have read and understood this Privacy Notice and consent to the collection, use, storage, and processing of your personal data in accordance with applicable laws.

3.1 Direct Marketing Consent

Where personal data is processed for direct marketing purposes, the Company shall:
3.1.1 Obtain clear, explicit, and informed consent (opt-in)

3.1.2 Provide customers with the ability to opt-out at any time
3.1.3 Maintain records of such consent

Consent shall be:
3.1.4 Freely given
3.1.5 Specific and informed
3.1.6 Capable of being withdrawn at any time

Withdrawal of consent shall not affect processing carried out prior to withdrawal.

3.2 What Constitutes Consent

Consent may be obtained when you:
3.2.1 Complete and sign proposal forms (including through agents/brokers)
3.2.2 Accept insurance terms and conditions
3.2.3 Provide personal data for underwriting or claims processing
3.2.4 Opt-in to receive marketing communications
3.2.5 Submit documents for AML CFT CPF compliance purposes
3.2.6 Interact with our digital platforms

4. INFORMATION WE COLLECT

4.1 Personal Data

We may collect the following personal data:
4.1.1 Identification details (name, address, phone number, email)
4.1.2 Date of birth and identification numbers (e.g., NIN, BVN where applicable)
4.1.3 Policy and transaction information
4.1.4 Claims-related information
4.1.5 Financial and risk-related information
4.1.6 Employment and income details
4.1.7 Photographs and supporting documentation

4.2 Sensitive Personal Data

Sensitive Information May include:
4.2.1 Medical records (for underwriting/claims)
4.2.2 Biometric data (where applicable)

4.3 Additional Data Collection

4.3.1 Location data during onboarding or verification (with consent)
4.3.2 CCTV recordings when visiting Company premises
4.3.3 Technical data (IP address, device ID, browser type) when using digital platforms

5. HOW WE COLLECT YOUR INFORMATION

We collect personal data when you:
5.1 Complete insurance proposal forms (directly or through agents/brokers)
5.2 Purchase, renew, or manage an insurance policy
5.3 Submit a claim or provide supporting documentation
5.4 Interact with customer service channels
5.5 Participate in surveys, campaigns, or feedback sessions
5.6 Undergo regulatory checks (e.g., AML/CFT/CPF, sanctions screening)
5.7 Engage with our digital platforms

We may also receive personal data from:

5.8 Brokers, agents, or intermediaries acting on your behalf
5.9 Reinsurers and service providers
5.10 Public sources or regulatory bodies, where required

6. LAWFUL BASIS FOR PROCESSING

We process personal data based on:
6.1 Performance of contract
6.2 Legal and regulatory obligations
6.3 Legitimate business interests
6.4 Consent (where required, especially for marketing)
6.5 Public interest obligations

7. HOW WE USE YOUR INFORMATION

We use personal data to:
7.1 Assess insurance risk and underwrite policies
7.2 Process and settle claims
7.3 Conduct AML/CFT/CPF and fraud checks
7.4 Comply with regulatory obligations
7.5 Improve products and services
7.6 Communicate with customers

8. SHARING OF PERSONAL DATA

We may share personal data with:
8.1 Regulators (e.g., NAICOM, NDPC)
8.2 Reinsurers and brokers
8.3 Service providers and vendors
8.4 Law enforcement agencies

All third parties are required to:
8.5 Maintain confidentiality
8.6 Process data only for specified purposes
8.7 Comply with NDPA and GAID requirements

9. CROSS-BORDER DATA TRANSFERS

Where personal data is processed outside Nigeria, the Company ensures:
9.1 Appropriate safeguards are in place
9.2 Access is authorized and role-based
9.3 Activities are logged and monitored
9.4 Confidentiality obligations are enforced

10. SECURITY OF PERSONAL DATA

We implement:
10.1 Access controls
10.2 Encryption
10.3 Monitoring and logging
10.4 Staff confidentiality obligations
10.5 Vendor compliance controls

11. DATA RETENTION

Personal data is retained only for as long as necessary to:
11.1 Fulfill contractual obligations
11.2 Comply with legal requirements
11.3 Support audit and regulatory obligations

Thereafter, data is securely deleted or anonymized.

12. DATA BREACH NOTIFICATION

Where a data breach occurs:
12.1 The NDPC shall be notified within the required timeframe
12.2 Affected individuals shall be informed where risk is high
12.3 Remediation actions shall be implemented

13. YOUR RIGHTS

You have the right to:
13.1 Access your personal data
13.2 Request correction
13.3 Request deletion
13.4 Withdraw consent
13.5 Object to processing
13.6 Lodge complaints with the NDPC

14. THIRD-PARTY AND VENDOR CONTROLS

All vendors processing personal data must:
14.1 Sign Data Processing Agreements (DPAs)
14.2 Implement adequate security controls
14.3 Comply with NDPA and GAID requirements
14.4 Be subject to periodic monitoring and risk assessment

15. CONTACT DETAILS

If you have any questions about this Privacy Notice or how your personal data is handled, please contact:

Data Protection Officer (DPO)
Coronation Life Assurance
dpo@coronationinsurance.com.ng

If you are not satisfied with our response, you have the right to lodge a complaint with the Nigeria Data Protection Commission (NDPC).

16. UPDATES TO THIS NOTICE

We may update this Privacy Notice from time to time to reflect changes in legal, regulatory, or operational requirements. Any updates will be published on our website, along with the effective date of the revised version.