

PRIVACY NOTICE

INTRODUCTION

Coronation Insurance Plc (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 in the course of providing insurance products and services.

SCOPE OF PROCESSING

We process personal data in relation to:

- insurance policy underwriting and onboarding
- claims processing and settlement
- broker and agent interactions
- customer service and engagement
- regulatory and compliance obligations

CONSENT TO PROCESSING OF PERSONAL DATA

By providing your personal data to Coronation Insurance Plc, 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.

Direct Marketing Consent

Where personal data is processed for direct marketing purposes, the Company shall:

- obtain clear, explicit, and informed consent (opt-in);
- provide customers with the ability to opt-out at any time; and
- maintain records of such consent.

Consent shall be:

- freely given
- specific and informed
- capable of being withdrawn at any time

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

WHAT CONSTITUTES CONSENT

Consent may be obtained when you:

- complete and sign proposal forms (including through agents/brokers)
- accept insurance terms and conditions
- provide personal data for underwriting or claims processing
- opt-in to receive marketing communications
- submit documents for KYC/AML purposes
- interact with our digital platforms

INFORMATION WE COLLECT

We may collect the following personal data:

- Identification details (name, address, phone number, email)
- Date of birth and identification numbers (e.g., NIN, BVN where applicable)
- Policy and transaction information
- Claims-related information
- Financial and risk-related information
- Employment and income details
- Photographs and supporting documentation

Sensitive Personal Data

May include:

- medical records (for underwriting/claims)
- biometric data (where applicable)

Additional Data Collection

- During onboarding or verification, we may collect location information (with your consent) to confirm address details.
- CCTV cameras may capture images when you visit our offices for security purposes.
- When you use our digital platforms, we may collect technical information such as IP address, device ID, and browser type for security and system administration.

HOW WE COLLECT YOUR INFORMATION

We collect your personal data when you:

- complete insurance proposal forms (directly or through agents/brokers)
- purchase, renew, or manage an insurance policy
- submit a claim or provide supporting documentation
- interact with our customer service channels
- participate in surveys, campaigns, or feedback sessions (where applicable)
- undergo regulatory checks (e.g., AML/CFT, sanctions screening)
- engage with our digital platforms (website, mobile applications)

We may also receive your personal data from:

- brokers, agents, or intermediaries acting on your behalf;
- reinsurers and service providers;
- publicly available sources or regulatory bodies, where required.

LAWFUL BASIS FOR PROCESSING

We process personal data based on:

- performance of contract
- legal and regulatory obligations
- legitimate business interests
- consent (where required, especially for marketing)
- public interest obligations

HOW WE USE YOUR INFORMATION

We use personal data to:

- assess insurance risk and underwrite policies
- process and settle claims
- conduct AML/CFT and fraud checks
- comply with regulatory obligations
- improve products and services
- communicate with customers

INSURANCE-SPECIFIC CONTROL IN ALIGNMENT WITH NIIRA 2025

Where a proposal form is completed by an **agent or broker on behalf of a customer**, such agent/broker must:

- clearly indicate completion on behalf of the customer;
- sign and confirm authorization; and
- ensure accuracy of information provided.

SHARING OF PERSONAL DATA

We may share personal data with:

- regulators (e.g., NAICOM, NDPC)
- reinsurers and brokers
- service providers and vendors
- law enforcement agencies

All third parties are required to:

- maintain confidentiality
- process data only for specified purposes
- comply with NDPA and GAID requirements

CROSS-BORDER DATA TRANSFERS

Where personal data is accessed or processed outside Nigeria the Company ensures:

- appropriate safeguards are in place;
- access is authorized and role-based;
- activities are logged and monitored;
- confidentiality obligations are enforced.

SECURITY OF PERSONAL DATA

We implement:

- access controls
- encryption
- monitoring and logging
- staff confidentiality obligations
- vendor compliance controls

DATA RETENTION

Personal data is retained only for as long as necessary to:

- fulfill contractual obligations
- comply with legal requirements
- support audit and regulatory obligations

Thereafter, data is securely deleted or anonymized.

DATA BREACH NOTIFICATION

Where a data breach occurs:

- NDPC shall be notified within the required timeframe;
- affected individuals shall be informed where risk is high;
- remediation actions shall be implemented.

YOUR RIGHTS

You have the right to:

- access your data
- request correction
- request deletion
- withdraw consent
- object to processing
- lodge complaints with NDPC

THIRD-PARTY AND VENDOR CONTROLS

All vendors processing personal data must:

- sign Data Processing Agreements (DPAs);
- implement adequate security controls;
- comply with NDPA and GAID;
- be subject to periodic monitoring and risk assessment.

CONTACT DETAILS

Data Protection Officer (DPO)

Coronation Insurance Plc

dpo@coronationinsurance.com.ng

 +2347062636157

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

UPDATES TO THIS NOTICE

This Privacy Notice may be updated periodically to reflect regulatory and operational changes.