

PRIVACY POLICY

1. INTRODUCTION

Coronation Life Assurance Limited (“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 life assurance products and services.

2. SCOPE OF PROCESSING

Coronation Life Assurance processes personal data in connection with the provision and administration of life insurance products and related services, including:

- 2.1 Policy underwriting and onboarding
- 2.2 Policy administration and lifecycle management
- 2.3 Claims processing and settlement
- 2.4 Beneficiary and nominee management
- 2.5 Broker, agent, and intermediary interactions
- 2.6 Customer service and relationship management
- 2.7 Medical assessments and underwriting support
- 2.8 Regulatory, legal, and compliance obligations

3. CONSENT TO PROCESSING OF PERSONAL DATA

By providing your personal data to Coronation life assurance limited, 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- 3.1.6 Capable of being withdrawn at any time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 through clear and affirmative actions, including when you:

- 3.2.1 Complete and sign proposal or application forms (including through agents or brokers acting on your behalf)
- 3.2.2 Accept policy terms and conditions, whether physically or through electronic channels
- 3.2.3 Provide personal data required for underwriting, policy administration, or claims processing
- 3.2.4 Provide **medical or health-related information** required for life assurance underwriting or claims assessment
- 3.2.5 Submit identification and supporting documents for KYC/AML and regulatory compliance purposes
- 3.2.6 Opt-in to receive marketing, promotional, or customer engagement communications
- 3.2.7 Interact with our digital platforms, including submission of information via our website, mobile applications, or other electronic channels
- 3.2.8 Provide information relating to **beneficiaries, nominees, or dependents** under a life assurance policy

4. INFORMATION WE COLLECT

4.1 Personal Data

We may collect and process the following categories of personal data:

- 4.1.1 Identification and Contact Details
- 4.1.2 Date of Birth and Unique Identifiers
- 4.1.3 Policy and Transaction Information
- 4.1.4 Claims-Related Information
- 4.1.5 Financial and Risk Information
- 4.1.6 Employment and Occupational 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 proposal or application forms
- 5.2** Purchase, renew, or manage a life assurance policy
- 5.3** Submit a claim or provide supporting documentation
- 5.4** Provide information relating to beneficiaries or nominees
- 5.5** Interact with our customer service channels
- 5.6** Participate in surveys, campaigns, or feedback sessions
- 5.7** Undergo regulatory and compliance checks
- 5.8** 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 Administer policies throughout their lifecycle
- 7.3 Process and settle claims and policy benefits
- 7.4 Manage beneficiaries and nominees
- 7.5 Conduct AML/CFT, sanctions screening, and fraud prevention checks
- 7.6 Comply with legal and regulatory obligations
- 7.7 Communicate with customers and stakeholders
- 7.8 Improve products, services, and customer experience
- 7.9 Undertake internal governance, audit, and risk management activities

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 Limited

dpo@coronationinsurance.com.ng

 +234 8104749929

OR

 +234 806 219 3050

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.