



# PRIVACY POLICY

December, 2019

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## PREAMBLE

Anchor Insurance company limited is committed to ensuring that the privacy and personal information of its clients and employees (data subjects) are protected. Anchor Insurance company limited is the entity that collects and processes your personal information and the responsibility is not outsourced to any third party. Anchor Insurance company limited is also responsible for complying with extant Nigerian and applicable international laws on data protection. For the purpose of this Privacy Policy, references to Anchor Insurance company limited or the Company shall mean Anchor Insurance company limited.

By providing the data subject's personal information or the personal information of a beneficiary from the data subject's policy, the data subject acknowledges that Anchor Insurance company limited may only use the information in the manner specified in this Privacy Policy.

There may be a need to update this policy periodically, for example as a result of government regulation, new technologies or other developments on data protection and / or privacy laws. The current version of this policy is available on our website ([www.anchorinsuranceng.com](http://www.anchorinsuranceng.com)).

## ROLE DEFINITIONS:

The following roles are defined for the purpose of this policy:

**Data Subject:** is an identifiable person; one who can be identified directly or indirectly, in particular by reference to an identification number or to one or more factors specific to his physical, physiological, mental, economic, cultural or social identity and includes Anchor Insurance's clients, customers, business partners and employees.

**Data Administrator:** means a persons or organization that processes data. For the purpose of this policy, Anchor Insurance company limited is the Data Administrator.

**Data Controller:** means a person who either alone, jointly with other persons or in common with other persons or as a statutory body determines the purposes for and the manner in which personal data is processed or is to be processed. For the purpose of this policy, the Managing Director is the Data Controller or whoever he so delegates.

**Data Protection Officer:** is appointed by the data controller to ensure that the strategy and implementation of data protection requirements are in compliance with the data protection policy and the relevant extant laws. For the purpose of this policy, the data protection officer is defined as the Head, Enterprise Risk Management of Anchor Insurance.

Responsibilities of the Data Administrator, Data Controller and Data Protection Officer are clearly outlined in the Nigeria Data Protection Regulation (2019).

## 1. INTRODUCTION

When Anchor Insurance company limited collects and process the personal information of its data subjects, Anchor Insurance company limited ensures it adheres to strict controls to ensure that personal data of the data subject is obtained and used in line with the company's privacy principles. Anchor Insurance company limited handles personal data with the greatest care and use it only for legitimate and specified business purposes under the following principles:

1. Anchor Insurance company limited respects the privacy rights of its employees, customers, clients, business partners and other individuals whose personal data are in its custody and use.
2. Anchor Insurance company limited protects personal data by implementing appropriate technical and organizational measures in our data processing operations.
3. Anchor Insurance company limited obtains personal data fairly and only use it for legitimate business purposes.
4. Anchor Insurance company limited holds itself accountable for demonstrating compliance with applicable legal and regulatory requirements and understanding of our roles and responsibilities.

All personal information collected by Anchor Insurance company limited is processed in accordance with the extant data protection laws in Nigeria.

## 2. TYPE OF INFORMATION PROCESSED BY ANCHOR INSURANCE COMPANY LIMITED

The precise nature of the personal data Anchor Insurance company limited processes depends on data subject's relationship with Anchor Insurance. However, in many cases, if the Company is handling the data subject's personal data as part of its role as an insurer, the Company may process the following:

1. Information about the data subject – for example name, age, gender, date of birth, nationality. Even though in some instances Anchor Insurance company limited do not receive your name, the Company needs enough information to identify the data subject and her policy so that the Company can provide services to its clients.
2. Means of identification – date of birth, National Identity Card Number (NIN), International Passport details, Drivers' License, Voter's card details, etc.
3. Contact information – in some cases, for example, the Company may receive the data subject's email, address, and phone number.

4. Online information – for example cookies and IP address (your computer's internet address), if you use Anchor Insurance's websites.
5. Financial information – the Company may process information related to payments the data subject makes or receive in the context of an insurance policy or claim. This includes information such as Bank Verification Number (BVN) and information obtained from credit reference agencies.
6. Contractual information – for example details about the policies a data subject holds and with whom the data subject holds them.
7. Other sensitive personal data (Health background / information, Marital status, criminal history record, Biometric details, Academic records, and Gender)

### **3. REQUIREMENT FOR CONSENT**

1. Where data subjects provide their consent for use of their personal information, Anchor Insurance company limited will explain the reason for obtaining the data subject's consent. Without such consent, Anchor Insurance company limited may be unable to provide the required cover or handle claims when they arise. Where the data subject provides personal information about third parties, Anchor Insurance company limited will ask such clients to confirm that the third party has given consent to the data subject to act on their behalf and will provide Anchor Insurance company limited with a copy of the consent issued.
2. Consent will be obtained via the same medium used to obtain personal information or through any other means that is acceptable to Anchor Insurance. Reference will be made to this Policy or a summarized version that can be easily understood by the data subject. The data subject will be required to indicate understanding and acceptance of the terms contained in the policy. This can be via signature for physical documents or a ticked checkbox for electronic platforms.
3. Where Anchor Insurance company limited has appropriate, legitimate business need to use client personal information for maintenance of business records including development and improvement of products and services, Anchor Insurance company limited will take extra care to ensure that the data subject's rights to security and confidentiality is not infringed upon.

### **4. REASONS FOR USE AND PROCESS OF DATA BY ANCHOR INSURANCE**

1. Anchor Insurance company limited will obtain the consent of the data subject before use and processing of the data for one or more specific purposes made known to the data subject.

2. Such personal data obtained with the consent of the data subject shall not be used in any manner other than the stated purpose for which the data was obtained, except with further consent of the data subject whether at the instance of the data subject or upon Anchor Insurance's engagement with the data subject.
3. Anchor Insurance company limited may use data subject's personal data for a number of reasons:
  - a) Underwriting our business with our clients
  - b) Managing claims
  - c) Assessing, improving and developing our services
  - d) Enhancing our knowledge of risk and insurance markets in general
  - e) Fulfilling legal or regulatory obligations and protecting ourselves and our clients against fraud. Such regulators include National Insurance Commission (NAICOM), National Financial Intelligence Unit (NFIU) and such other regulatory agencies that is created from time to time.
  - f) For the protection of public interest such as investigation of fraudulent claims and anti-money laundering checks.
  - g) For archiving purposes in the public interest, scientific or historical research purposes or statistical purposes.
  - h) For the purpose of assessment of proposed data subject's employability and other employee benefits-related purposes.
4. Anchor Insurance company limited applies information protection technologies including perimeter security, malware management, data loss prevention and backup & recovery. Anchor Insurance's data centers are also protected against environmental threats. Anchor Insurance's information security policies and practices apply to all personal information in the company's custody.
5. Anchor Insurance company limited will only transfer personal information to a third party where the company has ensured that such information is protected and the data subject's consent has been obtained. Anchor Insurance company limited will procure the privacy policy of the Third Party to guarantee the safeguard and protection of the personal data of the data subject in the custody of the third party. No consent shall be sought, given or accepted in any circumstance that may engender direct or indirect propagation of atrocities, hate, child rights violation, criminal acts and anti-social conducts.

## **5. METHODS OF COLLECTING PRIVATE INFORMATION**

1. In most cases, Anchor Insurance company limited receives personal data from third parties such as its corporate clients and may also receive personal data directly from the data subject.

2. The following shall comprise the method of collection of personal information:

1. Direct collection:

- a. Know Your Customer (KYC) forms
- b. Claim forms
- c. Forums and feedback forms
- d. Enquiry and Quote forms
- e. Recorded telephone conversations
- f. Digital touch points
- g. Electronics means (emails and apps)
- h. Employee engagement personal data forms (inclusive of medical report)

2. Third party's data collection source:

- a. Individuals or employers with policies with Anchor Insurance company limited under which a data subject is insured i.e. a named individual within a group life insurance policy.
- b. Credit reference agencies including credit ratings.
- c. Family members in the event of incapacitation or death of the insured for purpose of claims payment
- d. Medical professionals and hospitals
- e. Aggregators
- f. Loss adjusters, claim assessors, etc.

Provided that in the case of data obtained from third party source, a copy of the data subject's consent given to the third party to transfer the data to Anchor Insurance company limited shall suffice for the company's use and processing.

## **6. ANCHOR INSURANCE'S USE OF COOKIES**

- 1. Anchor Insurance's websites use cookies to track browsing history of visitors to improve their experience. All Anchor Insurance company limited websites provide visitors an option to accept the use of cookies during the browsing session. Consent must be received before any form of data processing can be performed. Every consent given by a data subject will be kept secured as evidence that consent was received.
- 2. In the case of Anchor Insurance's customers, the data subject will provide consent by responding to a dialogue box corresponding to declarations indicating whether consent is given or declined. Such declaration will be in clear and plain language.

## **7. SOCIAL MEDIA PLATFORMS**

1. The data subject may wish to participate in the various blogs, forums, and other social media platforms hosted by Anchor Insurance company limited ("Social Media Platforms") which are make available to the data subject. The main aim of these Social Media Platforms is to facilitate and allow the data subject share content. However, Anchor Insurance company limited cannot be held responsible if the data subject shares personal information on Social Media Platforms that is subsequently used, misused or otherwise appropriated by another user. The data subject is required to consult the Privacy Statements of such services before using them.

## **8. THIRD PARTY ACCESS AND PURPOSE OF ACCESS**

### **I. Disclosure to Employees**

1. Anchor Insurance's employees have access to and process personal data based upon a "need to know" basis in order to do their job. Anchor Insurance company limited regularly check who has access to its systems and data.

### **II. Disclosures to Third Parties**

1. Anchor Insurance company limited may disclose data subject's personal data to these categories of third parties:
  - a. Anchor Insurance company limited service providers and agents e.g. IT companies who support Anchor Insurance's technology, marketing agencies, research specialists, document management providers and tax advisers.
  - b. Anchor Insurance company limited professional advisers: auditors; reinsurers; medical agencies and legal advisers.
  - c. Client who provide Anchor Insurance company limited with data subject's personal data.
  - d. Persons legally authorized to act on behalf of Anchor Insurance company limited e.g. Lawyer, Insurance Broker and loss adjusters, etc.
  - e. Individuals nominated and authorized by the data subject to engage Anchor Insurance company limited on his/her behalf.
  - f. Anchor Insurance company limited recommended garage or other service provider recommended to the data subject.
  - g. Disclosure to Credit referencing organization to obtain information which may be used by Anchor Insurance company limited to determine its risk selection, pricing and underwriting decisions.



- h. Fraud detection agencies and other parties who maintain fraud detection registers.
- i. Customer relationship management
- j. Independent Customer satisfaction survey providers.
- k. Financial organizations and advisers.
- l. Government and its agencies.
- m. Emergency assistance Companies.
- n. Credit reference agencies.
- o. Debt collection agencies.
- p. Selected third parties in connection with the sale, transfer or disposal of the business or in connection with employee assessment, academic records verification and employee well-being survey.

The above disclosures to the third party shall be made only to the extent necessary for the specific purpose for which the data is provided and the third party shall be informed of the confidential nature of such information and shall be directed to keep the data subject's information strictly confidential.

## 9. LAWFUL PROCESSING OF PERSONAL DATA

1. Anchor Insurance company limited only processes personal data for legitimate business purposes and when a legal ground as set out in data protection regulation.
  1. There are a number of legal grounds that may apply and the following ones most likely to be relevant to the data subject:
    - a. Anchor Insurance company limited may process the personal data of the data subject when Anchor Insurance company limited obtains the data subject's consent or when Anchor Insurance's client obtains consent from the data subject.
    - b. Where the data subject has a contract with Anchor Insurance, the personal data of the data subject may be processed when it is necessary in order to enter into or perform a contract.
    - c. Where Anchor Insurance company limited has a legal obligation to perform such processing, such as where Anchor Insurance company limited shares information with its regulators, law enforcement agencies or court.
    - d. In order to protect the vital interests of the data subject or of another natural person.
    - e. In order to process the data subject's medical and other sensitive personal data when it is necessary to do so in connection with an insurance product.

- f. Where Anchor Insurance company limited is required to do so by law or regulatory bodies such as where a court order exists to such effect or there is a statutory obligation to do so.
  - g. Where it is necessary to facilitate prevention and/or detection investigation of criminal action (including fraud) or is otherwise in the overriding public interest.
  - h. Where exemptions under the Data Privacy law allows Anchor Insurance company limited to disclose such information.
  - i. Motor insurance database i.e. Nigeria Insurance Industry Database (NIID).
  - j. Where processing is necessary for the performance of a task carried out in the public interest or in the exercise of public mandate vested in Anchor Insurance.
2. Another legal ground for processing personal data is when Anchor Insurance company limited has a legitimate interest in so doing and can demonstrate that the interests are not outweighed by the data subject's rights or interests. Where Anchor Insurance company limited relies on legitimate interests' grounds for processing, Anchor Insurance company limited will make sure it processes only the minimum amount of data necessary and for the minimum amount of time necessary to achieve its objectives which includes:
- a. To enable Anchor Insurance company limited identify whether its products or services are operating effectively;
  - b. To enable Anchor Insurance company limited develop new products and services and make sure its offerings are fair;
  - c. To enable Anchor Insurance company limited as certain that its clients and policy holders are treated fairly.

The following table contain breakdown of lawful grounds which Anchor Insurance company limited relies on for processing personal information of its clients:

#	Purpose for collection and processing of data subject's personal information	Collectable Personal information includes but not limited to the ones set out below	Legal grounds for processing personal information
1	To review an insurance proposal and provide a quote in respect of the proposal.	Contact details, age, age of other persons included on the policy (e.g. employees, family members, etc.)  Information on the subject of insurance such as landed	The use described is necessary for provision of insurance cover. Where sensitive personal information is requested, exemptions may be applied for insurance purposes.

#	Purpose for collection and processing of data subject's personal information	Collectable Personal information includes but not limited to the ones set out below	Legal grounds for processing personal information
		<p>property, vehicles, past claims, recent damage, business premises, etc. Information on travel plans including destination, duration of stay, travel dates, etc.</p> <p>Information on nature of commercial enterprise and assets. Sensitive personal information such as health records. Any other information relevant to the request.</p>	
2	<p>To provide and manage insurance policies. To evaluate eligibility for, process and pay claims.</p>	<p>Contact details, age, age of other persons included on the policy (e.g. employees, family members, etc.)</p> <p>Information on subject of insurance such as landed property, vehicles, past claims, recent damage, business premises, etc.</p> <p>Information on travel plans including destination, duration of stay, travel dates, etc.</p> <p>Information on the nature of commercial enterprise and assets.</p> <p>Sensitive personal information such as health records.</p>	<p>The use described is necessary for provision of insurance cover.</p> <p>Where sensitive personal information is requested, exemptions may be applied for insurance purposes.</p>

#	Purpose for collection and processing of data subject's personal information	Collectable Personal information includes but not limited to the ones set out below	Legal grounds for processing personal information
3	For data subject's communication and resolution of complaints.	Contact details and any information relevant to the policy.	<p>The use described is required to provide the insurance cover and to resolve any legitimate concerns.</p> <p>Where sensitive personal information is requested, it may be necessary for the exercise and defense of Anchor Insurance's legal rights, where the client has provided consent or where we have applied and obtained exemption for insurance purposes.</p>
4	To evaluate insurance applications and data subject's ability to pay premiums in instalments or as at when due.	Contact details, bank account details, collateral information	Necessary to provide insurance cover.
5	To prevent, detect and investigate fraud. This may include collection of biometric information such as voice prints.	<p>Contact details, age, age of other persons included on the policy (e.g. employees, family members, etc.)</p> <p>Information about possessions such as landed property, vehicles, past claims, recent damage, business premises, etc.</p> <p>Information about travel plans including destination, duration of stay, travel dates, etc.</p> <p>Information about nature of commercial enterprise and assets.</p> <p>Information available in the public domain such as social media.</p>	<p>Necessary to provide insurance cover and a legitimate business need to prevent fraud.</p> <p>Where sensitive personal information is requested, it may be necessary for the exercise and defense of Anchor Insurance's legal rights, where the data subject has provided consent or where we have applied and exemption for insurance purposes.</p>

#	Purpose for collection and processing of data subject's personal information	Collectable Personal information includes but not limited to the ones set out below	Legal grounds for processing personal information
		Sensitive personal information such as biometrics (i.e. voice print).	
6	For the purpose of recovering debt.	Contact details, bank account details, collateral information.	Where there is a legitimate business need for debt recovery.  Where sensitive personal information is requested, the use described is necessary for establishing, exercising or defending the legal rights of Anchor Insurance company limited.
7	For the purpose of our own information systems management including; management of business processes such as maintaining financial and accounting records, analysis of financial results, internal and external audit requirements, receiving professional advice (e.g. tax or legal advice). We develop policies and security systems to ensure security and effective operation of our systems.	Information about the client including name, residential / office address, email address, telephone number, age and the age of other person(s) included on the policy (family members, business partners, employees).  Sensitive personal information about health or beneficiaries' health.	Anchor Insurance company limited has a legitimate business need to use its client's personal information to understand its business, monitor performance and maintain appropriate records.  Where sensitive personal information is provided, the information is used to determine if an exemption should be applied for Insurance purposes.
8	For research and analytical purposes and to improve our products and services.	Contact details, age, age of other persons included on the policy (e.g. employees, family members, etc.)  Information about possessions such as landed property, vehicles, past claims, recent damage, business premises, etc.  Information about travel plans including destination, duration of stay, travel dates, etc.	Research and data analytics are conducted for service improvement purposes in the interest of the data subject.  Where sensitive personal information is provided, Anchor Insurance company limited may apply an exemption for insurance purposes where appropriate.

#	Purpose for collection and processing of data subject's personal information	Collectable Personal information includes but not limited to the ones set out below	Legal grounds for processing personal information
		<p>Information about nature of commercial enterprise and assets.</p> <p>Sensitive personal information such as health records.</p>	
9	Compliance with legal and / or regulatory obligations	Details about the data subject, other related parties, specific product required by the data subject, service or benefit, depending on the nature of the obligation.	Necessary for Anchor Insurance company limited to comply with Legal and Regulatory obligations.
10	Providing improved quality, training and security (for example, with respect to recorded or monitored phone calls to our contact numbers); technology may include voice analytics	Details about our clients and other related parties, product or service having been discussed with the client or representative during a telephone conversation with Anchor Insurance company limited.	The use described is required for Legal and Regulatory compliance.
11	Providing marketing information to Anchor Insurance company limited clients including information about other products and services and undertaking customer surveys in accordance with preferences communicated by the data subject.	Name, contact details and marketing preference.	Data subject's consent.
12	Determination of employability, background check up, academic records verification, and employee surveys and other HR processes requiring personal identifiers.	Name, contact details, academic records, health background / information, Marital status, criminal history record, Biometric details, Academic records, and Gender	To determine employability and to improve employee wellbeing, insurance contracts and regulatory demands.

## 10. FOREIGN TRANSFER OF PERSONAL DATA

1. The transfer of client's personal information may be to a third party in a foreign country which has adequate data protection laws for data transfer, to be determined by the Attorney General of the Federation and the Data subject shall have the right to be informed of the appropriate safeguards for data protection in the foreign country.
2. Where the Attorney General of the Federation has not determined the third-party country, the data subject's personal information may be transferred to a third party in a foreign country in the following circumstances:
  - a) Where the data subject has consented to the proposed transfer after having been informed of the possible risks of such transfers
  - b) The transfer is for the performance of a contract between the data subject and the data controller
  - c) The transfer is for the performance of a contract concluded in the interest of the data subject between the Data Controller and another natural or legal person
  - d) The transfer is for public interest
  - e) The transfer is for the establishment exercise or defense of legal claim
  - f) The transfer is to protect the vital interest of the data subject or other persons, where the data subject is physically or legally incapable of giving consent.

The data subject shall have the right to be informed of the appropriate safeguards for data protection in the foreign country.



## 11. LENGTH OF TIME FOR KEEPING CLIENT PERSONAL INFORMATION

Anchor Insurance company limited shall keep data subject's personal information for as long as reasonably necessary to fulfil the relevant purposes set out in this Policy and in order to comply with our legal and regulatory obligations and subject to the limitation act in force in Nigeria. This includes keeping the data subject's information for a reasonable period of time after the data subject's relationship with Anchor Insurance company limited or its client has ended and particularly for statistical analysis, pricing and risk modelling purposes.

In certain instances, Anchor Insurance company limited will minimize personal data; or de-identify data for use in statistical or analytical activities. This is undertaken in accordance with the data protection laws.

## 12. DATA SUBJECT'S RIGHTS

1. Anchor Insurance company limited shall disclose the specific purpose for which the information is required before obtaining the information from the data subject and shall inform the data subject of his/her right and method of withdrawal of consent.
2. The data subject has the right to request that Anchor Insurance company limited perform certain activities on his/her personal information, such as request for a copy of their personal information, correction of errors on the personal information, a change in the use of their personal information, or delete their personal information. Anchor Insurance company limited is obligated to either carry out the data subject's instructions or explain why it may not be possible – usually because of a legal or regulatory issue.
3. Data subject have the following rights in respect of Anchor Insurance's use of their personal information:
  1. **Right to access:** The data subject has a right to a copy of their personal information as maintained by the Company
  2. **Right to rectify:** Anchor Insurance company limited takes due care to ensure that the personal information we maintain about data subjects are accurate and complete. However, if a data subject believes the information is inaccurate or incomplete, such data subject has the right to request an amendment.
  3. **Right to erase:** Under certain circumstances, a data subject may ask that Anchor Insurance company limited erase their personal information. For instance, where the personal information collected is no longer necessary for the original purpose or where consent is withdrawn. However, this will need to be balanced against other factors, such as the type of personal information obtained, the original reason for collection, archiving purposes in the public interest, scientific or historical research purposes or statistical purposes, and Anchor Insurance company limited continuous assessment of risk relating to the data subject. There may be some legal and regulatory obligations which prevents Anchor Insurance company limited from complying immediately.
  4. **Right to restriction of processing:** under certain circumstances, but subject to regulatory requirements, a data subject may be entitled to instruct Anchor Insurance company limited to stop using his/her personal information. This is applicable where: -

-  A data subject contests the accuracy of personal information held by the data controller
-  Processing of personal data of the data subject is unlawful



- ✚ The data controller no longer requires the personal data but the data is required by the data subject for establishment, exercise or defense of legal claims
- ✚ The data subject has objected to processing, pending the verification whether the legal grounds for the data controller override those of the data subject.

1. **Right to data portability:** under certain circumstances, data subjects have the right to ask that Anchor Insurance company limited transfers any personal information that they have provided to Anchor Insurance company limited to another third party. Once transferred, the other party will be responsible for safeguarding such personal information.
2. **Right to object to marketing:** Data Subject can object to the processing of his/her personal data for the purposes of third-party marketing
3. **Right to lodge a complaint:** Anchor Insurance company limited data subject has the right to lodge complaints, in the event that there is an objection to the manner in which personal information is being used by the Company. Such complaints can be communicated using contact details provided in our policy documentation. In certain cases, Anchor Insurance company limited may be unable to comply with data subject's requests for reasons such as our own obligations to comply with other legal or regulatory requirements. However, Anchor Insurance company limited will always respond to complaints and where compliance is not feasible, an explanation will be provided.

1. The Data Controller shall communicate any rectification or erasure of personal data or restriction to each recipient to whom the data the personal data has been disclosed, unless this proves impossible or involves disproportionate effort.
2. In some circumstances, exercising some of these rights will mean Anchor Insurance company limited is unable to continue providing cover under the data subject's insurance policy and may therefore result in cancellation of the policy. The data subject will therefore lose the right to bring any claim or receive any benefit under the policy, including in relation to any event that occurred before the right was exercised, if Anchor Insurance's ability to handle the claim has been prejudiced. Each data subject's policy terms and conditions set out what will occur in the event of a policy cancellation.
3. Some of Anchor Insurance's assessment of risks are made automatically by inputting the data subject's personal information into a system, the criteria of which is determined by Anchor Insurance's underwriting team and the decision is then calculated using certain automatic processes rather than

manual process via discussions. We make automated decisions in the following situations:

1. Premium computation: we use the data subject's personal information to determine premium and eligibility.
2. Fraud and money laundering prevention: Anchor Insurance company limited uses automated anti-fraud and money laundering filters that check against global databases individuals known to have undertaken fraudulent and / or money laundering transactions and will reject those applicants based on outcomes of the automated checks.
4. Application assessment: Anchor Insurance company limited may use scoring methods to assess applications, perform identity verification and determine premiums. Examples of information used by Anchor Insurance company limited systems to do this include age, address, lifestyle (e.g. smoking, drinking, exercise routines, etc.) and medical history. If a data subject does not consent to processing sensitive information in this manner, Anchor Insurance company limited may be unable to assess the application or provide a quote. Alternatively, Anchor Insurance company limited may only be able to offer the data subject policies that do not require Anchor Insurance company limited to have that information from the onset. The automated decision making performed by Anchor Insurance company limited systems during the application is proprietary to Anchor Insurance, and the results thereof is not shared with third parties.
5. Where the data subject chooses to opt out of automatic decision-making, a formal communication to that effect will suffice. However, in some situations, it may imply that Anchor Insurance company limited will be unable to offer a quote because automated decisions are necessary to price and issue certain policies.

Data subjects can enforce the above rights by sending an email to [info@anchorinsuranceng.com](mailto:info@anchorinsuranceng.com). The Data Controller is obligated to act on the request of the data subject without delay. In the event that the Data Controller does not take action on the request of the Data Subject, the Data Controller shall within one month of receipt of the request, inform the data subject of the reasons why the request has not been actioned.

The exercise of the rights listed above shall be in conformity with constitutionally guaranteed principles of Law for the general protection and enforcement of fundamental rights.

### 13. TRAINING

1. Ultimately, it is Anchor Insurance's employees who are the most important element of Anchor Insurance's commitment. Anchor Insurance's employees are involved in every step of the data lifecycle, including sourcing and receiving personal data, processing it in compliance with laws and regulations, employing safeguards, and establishing the means and schedules of retention and deletion. It is therefore imperative that Anchor Insurance's employees understand their role and be committed to safeguarding personal data.
2. Anchor Insurance company limited designs its training programme to be relevant, focused on the individual and also focused on concrete risks. Anchor Insurance company limited runs regular data protection and information security awareness campaigns. The Company also share with its employees other knowledge resources on data protection and privacy topics, including guidance on ways that they can better protect and safeguard personal privacy.
3. It is important that Anchor Insurance's employees understand the seriousness of protecting personal data and respecting privacy rights with the ability to relate this back to the risks and consequences from an individual perspective. Through Anchor Insurance's efforts, it remains committed to realize its goal to ensure its employees and business partners understand their respective roles and responsibilities for data protection compliance.

### 14. MARKETING

1. The data subject reserves the right to the use of his/her personal information for marketing and Anchor Insurance company limited shall obtain the consent of the client prior to using such information for marketing purpose in specific cases not covered under this policy.
2. Anchor Insurance company limited shall be committed to only send its data subjects insurance marketing communications that meets the needs and behaviors of the data subject. Where the data subject chooses to unsubscribe from our mailing lists, such can be achieved at any time by following the unsubscribe instructions that appear in all marketing emails or contact Anchor Insurance company limited via the details set out in this policy documents.
3. Periodically, Anchor Insurance company limited may run specific marketing campaigns through social media and digital advertising that the data subject may see which are based on general demographics and interests. Individual personal information is not used for these campaigns. Should a data subject not want to see such campaigns, the data subject

shall be responsible for adjusting preference settings within the specific social media platform including cookie browser settings

- Anchor Insurance company limited may retain any data provided on its website and mobile app for a reasonable period, subject to the client's prior approval, even if the contract is not consummated and such information may be used to make enquiry on why the contract is not consummated.

## **15. AUDIT AND ENFORCEMENT OF THE DATA PROTECTION POLICY**

The Internal Audit Department of the Company shall conduct the audit of the privacy and data protection practice, in accordance with the extant Data protection regulation and the Data Protection Officer shall be responsible for monitoring compliance with the regulation.

## **16. REMEDIES FOR VIOLATION OF DATA PROTECTION POLICY AND THE TIMEFRAME FOR REMEDY**

In the event of violation of this policy, the data controller shall within 15 days redress the violation. Where the violation pertains to the disclosure of the data subject's information without his/her consent, such information shall be retracted immediately and confirmation of the retraction sent to the data subject within 48 hours of the redress.

Where the violation is caused by any representative of the data controller, such representative shall be subject to appropriate sanction.

## **17. DOWNLOAD ANCHOR INSURANCE COMPANY LIMITED DATA PRIVACY POLICY**

To download a full copy of this policy in PDF format, [click here](#)

## **18. CONTACT DETAILS OF THE DATA CONTROLLER AND DATA PROTECTION OFFICER**

Anchor Insurance's Data Controller and Data Protection Officer can be contacted via the following details:

Delineate a data controller from a data processor.

Anchor Insurance company Limited

Plot 21, Ahmed Onibudo Street,

Victoria Island,

Lagos.

[dpo@anchorinsuranceng.com](mailto:dpo@anchorinsuranceng.com)