

Privacy Notice

What is this Privacy Notice for?

FBN Insurance Limited (“the Company”, “FBN Insurance”, “FBNI” “We”) values your Personal Data and we are committed to protecting your privacy whenever you interact with us. Please read this Privacy Notice (Notice) to understand our policies, processes and procedures regarding the processing of your personal data. FBN Insurance is also responsible for complying with extant Nigerian and applicable international laws on data protection. For the purpose of this Privacy Policy, references to FBNI or FBN Insurance or the Company shall mean FBN Insurance Limited.

By this Notice, We explain to you how your Personal Data is collected, used, managed and transferred by FBN Insurance and also explains how you can update your Personal Data with us and exercise your rights in respect of the Personal Data provided to us.

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 FBNI’s clients, customers, business partners and employees.

Data Administrator: means a persons or organization that processes data. For the purpose of this policy, FBN Insurance 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 Chief Compliance Officer of FBN Insurance.

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

Methods of collecting private information

We collect Personal Data that you give to us for example, when completing proposals forms or on our mobile apps, request for further information about our product, fill a form, apply for a job.

We may also automatically collect some technical information when you visit our website such as your IP address, and information about your visit, such as the pages that you viewed. This information helps us understand customer interests and helps us improve our website. When you visit our site, the pages that you look at, and a short text file called a cookie, are downloaded to your computer. By visiting and using our website, you agree to our use of cookies in line with

FBN Insurance's policies. Generally, FBNI collects data through the following ways:

1. In most cases, FBNI receives personal data directly from the data subject or from third parties such as its corporate clients.
2. The following shall comprise the method of collection of personal information:
 1. Direct collection:
 1. Know Your Customer (KYC) forms
 2. Claim forms

3. Forums and feedback forms
 4. Enquiry and Quote forms
 5. Recorded telephone conversations
 6. Digital touch points
 7. Electronics means (emails and apps)
 8. Employee engagement personal data forms (inclusive of medical report)
2. Third parties data collection source:
 1. Individuals or employers with policies with FBNI under which a data subject is insured i.e. a named individual within a group life insurance policy.
 2. Credit reference agencies including credit ratings.
 3. Family members in the event of incapacitation or death of the insured for purpose of claims payment
 4. Medical professionals and hospitals
 5. Aggregators
 6. 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 FBNI shall suffice for the company's use and processing.

Who do we share your Personal Data with and why?

1. Disclosure to Employees

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

2. Disclosures to Third Parties

1. FBNI may disclose data subject's personal data to these categories of third parties:
 1. FBNI's service providers and agents e.g. IT companies who support FBNI's technology, marketing agencies, research specialists, document management providers and tax advisers.
 2. FBNI's professional advisers: auditors; reinsurers; actuaries; medical agencies; technical partners and legal advisers.
 3. Client who provide FBNI with data subject's personal data.
 4. Persons legally authorized to act on behalf of FBVNI e.g. Lawyer, Insurance Broker, Financial Advisors, etc.
 5. Individuals nominated and authorized by the data subject to engage FBNI on his/her behalf.
 6. Disclosure to Credit referencing organization to obtain information which may be used by FBNI to determine its risk selection, pricing and underwriting decisions.
 7. Fraud detection agencies and other parties who maintain fraud detection registers.
 8. Customer relationship management
 9. Independent Customer satisfaction survey providers.
 10. Financial organizations and advisers.
 11. Government and its agencies.
 12. Emergency assistance Companies.
 13. Credit reference agencies.
 14. 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.

Lawful Processing of Personal Data

1. FBNI 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:
 1. FBNI may process the personal data of the data subject when FBNI obtains the data subject's consent or when FBNI's client obtains consent from the data subject.
 2. Where the data subject has a contract with FBNI, the personal data of the data subject may be processed when it is necessary in order to enter into or perform a contract.
 3. Where FBNI has a legal obligation to perform such processing, such as where FBNI shares information with its regulators, law enforcement agencies or court.
 4. In order to protect the vital interests of the data subject or of another natural person.
 5. 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.
 6. Where FBNI 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.
 7. Where it is necessary to facilitate prevention and/or detection investigation of criminal action (including fraud) or is otherwise in the overriding public interest.
 8. Where exemptions under the Data Privacy law allows FBNI to disclose such information.

9. 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 FBNI.
2. Another legal ground for processing personal data is when FBNI 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 FBNI relies on legitimate interests grounds for processing, FBNI 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:
 1. To enable FBNI develop new products and services and make sure its offerings are fair;
 2. To enable FBNI identify whether its products or services are operating effectively;
 3. To enable FBNI ascertain that its clients and policy holders are treated fairly.

What Purpose do We use your Personal Data?

We may process your Personal Data to communicate with you (including sending marketing or promotional materials to you), provide you with further information about our products and how we can serve you better, respond to your purchase orders or requests, process your application for employment with FBN Insurance or to fulfil our contractual obligations with you. We may also process your Personal Data to comply with provisions of applicable laws.

What Constitutes your Consent?

Where processing of Personal Data is based on consent, We shall obtain the requisite consent at the time of collection of the Personal Data. In this regard, you consent to the processing of your Personal Data when you access our platforms, or use our services, content, features, technologies or functions offered on our website or other digital platforms. You can withdraw your consent at any time but such withdrawal will not affect the lawfulness of processing based on consent given before its withdrawal.

Security and Retention of your Personal Data

Your Personal Data is kept private and We make every effort to keep your Personal Data secure, including restricting access to your Personal Data with us on a need to know basis. We require our staff and any third parties who carry out any work on our behalf to comply with appropriate security standards to protect your Personal Data.

We take appropriate measures to ensure that your Personal Data is only processed for the minimum period necessary in line with the purposes set out in this Notice or as required by applicable laws, until a time it is no longer required or has no use. Once your Personal Data is no longer required, it is destroyed in a safe and secure manner.

Your Rights

FBN Insurance collects Personal Data only for the purposes identified in this Policy and such information cannot be reused for another purpose that is incompatible with

the original purpose.

You can exercise the following rights with respect to your Personal Data with FBN Insurance:

- a) request for and access your Personal Data collected and stored by FBN Insurance;
- b) withdraw consent at any time. For example, you can withdraw your consent to receipt of our marketing or promotional materials or unsubscribe to our newsletters;
- c) object to automated decision making;
- d) request rectification and modification of Personal Data kept by FBN Insurance;
- e) request for deletion of your Personal Data;
- f) be informed of and entitled to provide consent prior to the processing of Personal Data for purposes other than that for which the Personal Data were collected;
- g) request that FBN Insurance restricts processing of your Personal Data; and
- h) request for information regarding any specific processing of your personal data.

If you wish to exercise any of these rights, you may contact our Data Protection Officer (DPO) using the contact details provided below. You also have the right to complain to the National Information Technology Development Agency (NITDA) if you believe that we have violated your privacy rights using their email address: info@nitda.gov.ng

Changes to our Privacy Notice

Due to constant changes in technology and regulatory requirements, we may need to change our privacy policies or update this Notice from time to time. You will always be able to find the most recent version of our updated privacy policy on this site.

Contact & Communication

If you would like further information on this Notice, or to contact our DPO, you may contact us at FBN Insurance Limited, 34 Marina, Lagos, Nigeria or at dataprotection@fbninsurance.com

Version Control

Version	Last Updated	Reason for Amendment