#### Continental Re-Insurance PLC

#### Privacy Policy

Continental Reinsurance PLC ("Continental Re") is a Data Controller - meaning that we determine the purposes for and manner in which your Personal Data is processed or is to be processed and are strongly committed to protecting your privacy while interacting with our content, products and services. We want to provide a safe and secure environment for you. The purpose of this Privacy Policy is to tell you what kind of information we may gather about you when you visit our site, our offices or engage our services. It also enlightens you on how we may use that information, whether we disclose it to anyone, the choices you have regarding our use of this information, your ability to correct this information as well as your rights regarding the processing, use, dissemination and deletion of your personal information.

Our policy allows you to choose, subject, of course, to the requirements of the Insurance Act and subsidiary legislation as well as in line with the provisions of the Nigeria Data Protection Laws (Nigeria Data Protection Regulation 2019, Nigeria Data Protection Act 2023) what kind of and how much information you provide to us and to control how we use whatever information you give us. Our goal is to provide you with a satisfying experience while allowing you to control your privacy and to give you a means to voice any questions or concerns you may have.

The pages on this website ('the website') are published by The News Market (TNM) (s' or 'we') on behalf of Continental Reinsurance Plc ('Continental Re'). We will not collect any information about individuals, except where it is specifically and knowingly provided by them.

When you use this website, we automatically collect information about your browsing session such as your IP address and what type of device you are using (e.g. a computer, a smart phone or a tablet). We also keep a record of the pages that you view during your visit. This information is used to improve the way in which our website operates and for systems administration purposes.

## Consent

You accept this Privacy Policy and hereby give us consent to save, process and use your Personal Data to the extent as allowed by law when you provide us with details of your Personal Data or by clicking on the "accept" button. We may request for further consent in the event that your Personal Data is required to be transferred to a third party for marketing purposes or when it is to be further processed in a manner which would require your further consent. For the purpose of this policy, Personal Data shall be as defined by the Nigeria Data Protection Laws and shall mean any information that may be used to identify you. This includes but is not limited to your name, address, email address, phone number, IP address, IMEI number etc. You may withdraw your consent at any time before, during and after we process your Personal Data.

We may use and transfer your Personal Data either with your consent, for compliance with a legal obligation to which we are subject or when we have assessed that it is necessary for the purposes of the legitimate interests pursued by us or by a third party to whom it may be necessary to disclose information. We may also use your Personal Data to further develop the quality of our services.

## **Collection of Information**

Information is collected from you primarily to make it easier and more rewarding for you to use our services. Depending on the service you are accessing, you could be asked to provide information such as your name, email address or information about a few other things. It is entirely your choice whether to respond to these questions or not. Continental Re-insurance plc collects two types of information. The first type is anonymous information. For instance, we may collect information to tell us that five thousand people visited this Privacy Policy today, but we do not know their names, where they live or their date of birth – they are 'anonymous' to us. Another example of Continental Re-insurance plc collecting anonymous information is when Continental Re-insurance plc audiences are invited to respond to surveys on our website. The surveys may ask you for demographic information such as your age, gender and postal address. This information is collected for research purposes, is used in the aggregate (where possible), and remains anonymous. Many of the individuals who access our services are anonymous to us.

The second type of information that Continental Re-insurance plc collects is Personal Data. Continental Re-insurance plc will collect Personal Data that lets us know the specifics of who you are such as your name, gender, date of birth, telephone number, email address, or postal address, details of your interactions with us through our offices, contact/customer centres or online. With this information, Continental Re-insurance plc can provide a variety of personalised and enhanced services that are not available to anonymous users. We hope that you will find it beneficial to provide individually identifiable information about yourself to us because it will make our services more valuable to you. Sometimes, we may specifically ask for Personal Data about you when you sign up to use a service. Certain information may be required, such as your name, age, internet address in order to provide that service or product to you. This information may also be used to inform you of additional products and services which may interest you. You can choose not to receive such information when you are undertaking product or service registration on our website. How much of your Personal Data that you choose to disclose to Continental Reinsurance plc is completely up to you. The only way we know something about you personally is if you provide it to us.

Your personal information will not be retained for longer than necessary for the purposes for which it was processed unless a longer retention period is required or permitted by law. Where we cannot determine the period in which your personal data will be stored, the criteria used in determining such period will be communicated to you.

# Use of anonymous information

Continental Reinsurance plc may automatically gather anonymous information to monitor the use of the site like the numbers and frequency of visitors to the site. We only use such data in the aggregate. This collective data helps us determine how much our audiences use parts of the site, so we can improve and make the site as appealing as we can make it for as many users as possible. Continental Reinsurance plc may publish or provide this aggregate data to other people.

## **Use of Personal Data**

Continental Reinsurance plc will only use the Personal Data you have chosen to provide us for the purpose for which you provided it. We will not use it for any other purpose without your consent.

## Disclosure

There will be occasions when it might be necessary for us to disclose your Personal Data to third parties such as the industry Regulator. Continental Reinsurance plc may be required by law to disclose the information. We may also be required to disclose your Personal Data to third parties to provide the service you have requested. However, the disclosure will only be made where it is necessary to fulfil the purpose for which you disclosed your Personal Data. Other than stated above, we do not disclose Personal Data that you may give us, such as your name, address, email address or telephone number, to any organization or person outside Continental Re-insurance plc unless you have authorised us to do so.

## No sale of Personal Data

Under no circumstances will Continental Reinsurance plc sell or receive payment for disclosing your Personal Data. Ultimately, you are solely responsible for maintaining the secrecy of your passwords and/or any other Personal Data. Be responsible whenever you are online.

## **Your Rights**

The law gives you certain rights in respect of the information we hold about you. Below is a highlight of some of those rights. It is not a complete, exhaustive statement of your rights in respect of your Personal Data:

- You have a right to consent to this Privacy Policy and to withdraw your consent at any time.
- You have a right to a copy of the Personal Data we hold about you, as well as the information about what we do with it, who we share it with and how long we hold it for. We may make a reasonable charge for additional copies of that data in the case of unfounded and excessive requests.
- You have a right to freely transfer your data received from us to any other person.
- You have the right to have the information we hold about you corrected, if it is factually inaccurate. You may contact us for this purpose.
- In some circumstances, you have the right to the deletion of the information that we hold about you.
- You have a right to lodge a complaint about the handling of your personal information with the Nigeria Data Protection Commission (NDPC) at https://ndpc.gov.ng/
- You have the right to ask us not to process your personal data for marketing purposes. We will usually inform you (before collecting your data) if we intend to use your data for such purposes or if we intend to disclose your information to any third party for such purposes. NDPC's website (<u>https://ndpc.gov.ng/</u>) has a wealth of useful information in respect of your rights over your Personal Data. If you wish to exercise your rights, you may contact our Data Protection Officer at *pifewulu@continental-re.com*.

## Access and correction: Personal Data

If Continental Reinsurance plc holds your Personal Data, we will, where possible, provide you with access to the information. We will also take reasonable steps to correct the information so that it is accurate, complete, and up to date.

#### Access by 3<sup>rd</sup> Parties

In the course of providing services to you, we may share your personal data with trusted third parties. We require that these parties agree to process such Personal Data based on our instructions and in compliance with the Nigerian Data Protection Laws and any other appropriate confidentiality and security measures. We provide only information they need to perform their specific services and we will work closely with them to ensure that your privacy is respected and protected at all times. In the event that we no longer require their services, any of your data held by them will be irrecoverably deleted in line with the Nigerian Data Protection Laws.

For fraud management or in line with public interest, we may share information about fraudulent or potentially fraudulent activity in our system which may include sharing data about individuals with law enforcement bodies.

We may also be required to disclose your Personal Data to law enforcement, regulatory or government body upon a valid request to do so. These requests, however, will be assessed on a case-by-case basis and the privacy of our customers shall be considered.

When we do not have a lawful basis for disclosure of your Personal Data, we will obtain consent from you before sharing your Personal Data with third parties. Where we need to transfer your Personal Data to another country, such country must have an adequate data protection law. We will seek your consent where we need to send your Personal Data to a country without an adequate data protection law.

#### Security

Continental Reinsurance Plc takes reasonable measures to ensure that Personal Data is stored securely from theft, loss, misuse and unauthorized access, disclosure, alteration and destruction, using modern software that is kept-up-to-date. Access to Personal Data shall be limited to personnel who need access and appropriate security measures shall be in place to avoid unauthorized sharing of information. When Personal Data is deleted, this will be done safely such that the data is irrecoverable. Appropriate back-up and disaster recovery solutions shall be in place.

#### **Breach/ Privacy Violation**

In the event of a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to, personal data, Continental Reinsurance Plc shall within 72 (Seventy-Two) hours of having knowledge of such breach report the details of the breach to NDPC. Furthermore, Continental Reinsurance Plc shall within 7 (Seven) days of having knowledge of the occurrence of such breach take steps to inform the Data Subject of the breach incident, the risk to the rights and freedoms of the Data Subject resulting from such breach and any course of action to remedy said breach.

If you feel that your Personal Data has not been handled correctly or you are unhappy with our response to any requests you have made to us regarding the use of your personal data, you have a right to lodge a complaint with the Nigeria Data Protection Commission (NDPC).

Nigeria Data Protection Commission (NDPC).Tel: + +234 916 061 5551 Email: <u>info@ndpc.gov.ng</u> Website: www.ndpc.gov.ng

# Cookies

This website also makes use of cookies, which are small pieces of information that allow us to maintain your connection to our website. Cookies allow a web server to transfer data to a computer or device for record keeping and other purposes. We may use cookies for detecting what kind of device you have in order to present content in the best way, for a language switch and/or for other purposes which are intended to serve you better. These cookies do not collect or store any personally identifiable information. If you do not want information collected through the use of cookies, there is a simple procedure in most browsers that allows you to decline the use of cookies. However, if you do this, you may lose some useful functionality such as personalization such as "Keep Me Signed In" and "Remember Me" features. To learn more about cookies, please visit http://www.allaboutcookies.org/.

**Changes to Continental Reinsurance Plc** changes we make to this policy in the future will be posted on this page and if necessary, will be communicated to you by e-mail. Please check back frequently to see any updates or changes to this Policy.

## Links

For your information and convenience we may have included links on this website to other sites that we believe you may find useful. These websites will each have their own privacy statement, which may differ from ours. Therefore please ensure, when you click on any of our links, that you read the privacy statement located on the website you have selected. Any external websites hyperlinked with this site are not within our control.

#### **Further information**

If you have any queries in relation to this Privacy Policy, please <u>contact us</u>.

#### Legal information

Welcome to the Continental Reinsurance website, a publication of Continental Reinsurance Plc Corporate Name: Continental Reinsurance Plc. Registered Number: RC73956 Registered Office: Continental Re Centre,

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