

DATA PROTECTION POLICY

At Africa Prudential PLC, we treat the privacy of our visitors with the highest importance. This policy details the measures we take to preserving and safely guarding your privacy when you visit our site or communicate with our personnel. The Privacy Policy here has been approved and provided by our legal advisors.

A detailed explanation of how we may store or otherwise use personal information about you is explained in this Data Protection Policy. We undertake regular updates to our Data Protection Policy which we will notify you of on our website or by email.

1. INFORMATION COLLECTION

We collect the following personal information from our website and interaction with you:

- Name and title
- Email address
- Phone number
- Gender
- Social media account details
- Your comments, reviews and response to feedback surveys or comment boxes
- IP address
- Domain name
- Your location

2. YOUR INFORMATION AND HOW IT IS USED

Primarily, we collect and store data about you to help us better connect with you. The following are purposes we may use your information for:



- •To monitor, review, evaluate and improve your experience when you visit our website
- •To analyse the traffic on our website, including determining the number of visitors to the website and analyse how they navigate the website.
- •To invite you to complete a survey or provide feedback to us on specific matters
- •At any time you request information from us via a form or other electronic transmission we may use your information to fulfil that request.
- •To keep you updated on our activities, programmes and events where consent has been given.
- •To notify you of changes to our websites or relevant processes.
- •We may also use your information or allow a trusted third-party such as our investee companies, subsidiaries and affiliates use of this data, to offer you information about unrelated products or services you may be interested in. We or third parties can only communicate if you have consented to such communication and data use.
- Where we have any contracts with you which create a commitment, we may require contact or use of your information.
- •To process or manage your appointments with any of our staff
- •To fulfil legal obligations to report any criminal or unethical activity
- •Be aware we do not reveal identifiable information about you to our advertisers, though we may at times share statistical visitor information with our advertisers.

3. ACCESSING INFORMATION

The Nigerian Freedom of Information Act 2011 provides you with the right to access the information that we collect about you. Please note any demand for access may be subject to a fee which covers our costs in providing you with the data requested.

For residents in the European Union, the following additional rights are applicable:

• The right to withdraw consent previously given to us or our trusted third parties



- •The right to request that we delete your personal information that is in our possession, subject however to retention required for legal purposes and the time required technically to delete such information.
- •The right to request for access to your personal information or object to us processing the same
- •The right to update your personal information that is kept with us
- •The right to receive your personal information and have it transferred to another data controller, as applicable.
- •The right to lodge a complaint

You may contact us via the email address provided at the end of this policy with respect to the exercise of any of the above stated rights or if you would like to learn more about the personal information we have of you.

4. PERSONS WHO HAVE ACCESS TO YOUR INFORMATION

In addition to our staff who are responsible for our marketing and communication and IT security, the following trusted third parties have access to your information:

- We use a customer relationship management tool to help manage our contact database and send out email communications to you.
- •Our investee companies, subsidiaries and affiliates who require your information for the same purposes described in this policy and who have adopted similar data protection policy standards.
- Professional service providers such as IT providers, website hosts and advertising partners.

We will transfer your personal information to only those third parties who we are sure can offer the required level of protection to your privacy and information. We do not and will not at any point in time sell your personal information to any third party. Where required by law, we may need to disclose your information to regulatory authorities.



5. COOKIES

Our advertisers and organisation may have the occasion to collect information in regard to your computer for our services. The information is gained in a statistical manner for our use or advertisers on our site.

Data gathered will not identify you personally. It is strictly aggregate statistical data about our visitors and how they used our resources on the site. No identifying personal information will be shared at any time via cookies.

Close to the above, data gathering can be about general online use through a cookie file. When used, cookies are automatically placed in your hard drive where information transferred to your computer can be found. These cookies are designed to help us correct and improve our site's services for you. You may elect to decline all cookies via your computer. Every computer has the ability to decline file downloads like cookies. Your browser has an option to enable the declining of cookies. If you do decline cookie downloads you may be limited to certain areas of our site, as there are parts of our site that require cookies.

Any of our advertisers may also have a use for cookies. We are not responsible, nor do we have control of the cookies downloaded from advertisements. They are downloaded only if you click on the advertisement.

6. SECURITY

Information submitted by you is stored on secure servers we have which are encrypted and access is restricted to only authorised persons in charge of maintaining the servers. We have put in place physical, electronic and procedural processes that safeguard and protect your information against unauthorised access, modification or erasure. However, we cannot guarantee 100% security as no security programme is completely fool proof.

As you know, transmission of data on the internet is never guaranteed regarding safety. It is impossible to completely guarantee your safety with



electronic data and transmission. You are therefore at your own risk if you elect to transmit any data.

7. TRANSFER OF PERSONAL DATA

The personal information we collect may be transferred to and processed in another country other than your country of residence for the purposes stated above. The data protection laws in those countries may be different from, and less stringent than the laws applicable in your country of residence. By accepting this privacy policy or by providing information to us, you expressly consent to such transfer and processing. We will however take all reasonable steps to ensure that your data is treated securely, in accordance with this policy and transfer of your information will only be done to parties how have put in place adequate controls to secure and protect your information.

8. RETENTION OF PERSONAL INFORMATION

We retain your personal information for no longer than reasonably necessary for the purposes set out in this policy and in accordance with legal and regulatory requirements.

9. THIRD PARTY LINKS

Links on our site that belong to third parties may be found. These websites have their Privacy Policy, which you agree to when you link to the site. You should read this third party policy. We do not accept claims of liability or responsibility in any way for these policies or links, as we have no way to control the third party sites.

10. CONTACTING US

We welcome any queries, requests you may have regarding this Data Protection Policy, or comments. Please feel free to contact us at dataprotectionofficer@africaprudential.com

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