

PRIVACY NOTICE

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At Old Mutual Nigeria Life Assurance Company Limited, we are committed to protecting your privacy and ensuring that your personal information is collected and used appropriately, lawfully and transparently.

This privacy notice explains:

- Who we are
- Overview
- What personal information we collect
- How we use your personal information
- Our legal basis for using your personal information
- Who we share your personal information with and why
- Retention of your personal information
- How we keep your personal information secure
- Use of cookies
- Your rights
- Transfers of personal information
- How to contact us

This privacy notice also sets out various rights that you may exercise in respect of our use of your personal information. A fundamental right of which you should be aware of is you may ask us to consider any valid objections which you have to our use of

your personal information where we process your personal information on the basis of our, or another person's, legitimate interest.

Please read this privacy notice carefully to understand how we handle your personal information before you access or browse our website, or provide your personal information to us.

Who we are

Old Mutual Limited is the ultimate parent company of the Old Mutual Nigeria Life Assurance Company Limited.

Overview

This privacy notice sets out how Old Mutual Nigeria Life Assurance Company Limited ensures that your personal information is collected and used appropriately, lawfully and transparently. Our businesses maintain their own policies and processes around the collection and use of the personal information of their customers, and you should refer to their individual websites for more information.

The Old Mutual Nigeria Life Assurance Company Limited website may contain links to other third-party websites. We have no control over how your data is stored, or used by other websites, and we advise you to check the privacy notices of any such websites before providing any data to them.

Our responsibilities

Old Mutual Nigeria Life Assurance Company Limited is responsible for your data in relation to your use of this website, as a stakeholder of the Company, and/or your status as an employee of Old Mutual Nigeria Life Assurance Company Limited. Our registered address is 19A, Adeola Odeku street, Victoria Island incorporated in Nigeria under registration number RC 255842 and 2nd floor Ecobank building Plot 21 Ahmadu Bello way Victoria Island Lagos with registration number: RC 507968. We are the Data Controller of the personal information that we collect from you, and as such we control the way in which your personal information is collected and the purposes for which your personal information is used.

What personal information we collect

We collect personal information directly from you. For example, we ask for personal information at the start of our relationship (e.g. when you become a stakeholder),

and in subsequent communications in order to check your identity. This is a legal requirement and is important to help safeguard you and us against potential crime. We may also collect information about you from other sources such as external third parties and from cookies on our website.

Details of the key categories of personal information we collect are set out below, but please contact us if you would like more detailed information.

This personal information about you will include:

- your name
- address and e-mail address
- where relevant, your job title, your company name and your company's address
- data provided when you correspond with us
- any updates to data provided to us

In relation to our website

We collect information about how you logged on and off of our website, including your IP address, information about your visit, your device information and how you use our website. This will include the capture of your approximate location information - please see the Cookies Policy on our website for further information on this.

In relation to our service providers

If you are a supplier to Old Mutual Nigeria Life Assurance Company Limited (or an employee or other personnel of a supplier), we will hold information in relation to the persons who are engaged in the provision of those services to us, service related data, relationship management data, and other information that you might have provided to us, or which we may have collected from the company's website.

In all cases we will keep your personal information only as long as is necessary for the purpose for which it was collected, or for legal or regulatory reasons. Personal information is securely disposed of when it is no longer required to be held.

How we use your personal information

We process your information to perform our contract with you, to fulfil our obligations to our stakeholders and to support and maintain that relationship, and to comply with legal obligations. We also use it:

- For internal corporate reporting, business administration, ensuring adequate insurance coverage for our business, and to identify and implement business efficiencies.
- To comply with any procedures, laws and regulations which apply to us - this may include where we reasonably consider it is in our legitimate

interests or the legitimate interests of others to comply, as well as where we are legally required to do so.

- To establish, exercise or defend our legal rights - this may include where we reasonably consider it is in our legitimate interests or the legitimate interests of others, as well as where we are legally required to do so.

In relation to our stakeholders

If you are a stakeholder, we will use your personal information:

- to register you as a stakeholder and maintain and keep this information up to date
- to deal with any enquiries or issues you might raise
- to provide you with relevant information, reports and communications
- for other legitimate purposes connected with you as one of our stakeholders

In relation to our website

When visiting our websites, we will use your personal information:

- to allow you to access and use our websites
- to provide technical support
- to provide you with the information that you request from us
- to ensure the security of our services and our websites
- to store information about your preferences
- to recognize you when you return to our websites
- for improvement and maintenance of our websites

Details relating to the usage of our websites by individuals will be anonymized as far as is reasonably possible and you will not be identifiable from the data collected.

In relation to our service providers

If you are a supplier to Old Mutual Nigeria Life Assurance Company Limited (or an employee or other personnel of a supplier), we will use your information to manage and receive the services you provide, and to exercise our rights and obligations in respect of those service (including to confirm and process orders, for administration of accounts, and for tax and payment purposes).

Our legal basis for using your personal information

We can only use your personal information if we have a proper reason for doing so. We consider that the legal bases for using your personal information as set out in this privacy notice are as follows:

- To comply with our legal and regulatory obligations
- To perform a contract with you or to take steps at your request before entering into a contract
- To respect your choice if we request your consent for specific processing

- To use your personal information as is necessary for our legitimate interests or the legitimate interests of others. In some cases, we have identified where this is the case elsewhere in this privacy notice. Our legitimate interests are:
 - to run and manage our business
 - to provide information to our stakeholders
 - to perform checks (such as identification checks and other verifications in line with money laundering or other requirements) on those we interact with
 - to operate our websites
 - to select appropriately skilled and qualified suppliers
 - to make and receive payments
 - for internal group administrative purposes

If we rely on our (or another person's) legitimate interests for using your personal information, we will undertake a balancing test to ensure that our (or the other person's) legitimate interests are not outweighed by your interests or fundamental rights and freedoms which require protection of the personal information.

Who we share your personal information with and why

We share your information with trusted third parties, who perform tasks for us and help us to provide our products and/or services to you, and with other agencies where required by law, court order or regulation. These include:

- Other companies within the Old Mutual Group
- Our Registrars
- A third party to verify your identity, in line with money laundering or other requirements
- Organizations, including the police and fraud prevention agencies, to prevent and detect fraud
- Regulatory or governmental agencies
- Our service providers and sub-contractors, including but not limited to payment processors, and suppliers of technical and support services
- Analytics and search engine providers that assist us in the improvement and optimization of our website

Any third parties with whom we share your personal information is limited (by law and by contract) in their ability to use your personal information for any purpose other than to provide services for us. We will always ensure that any third parties with whom we share your personal information are subject to privacy and security obligations consistent with this privacy notice and applicable laws.

We will also disclose your personal information to third parties:

- Where it is in our legitimate interests to do so to run and manage our business, such as:
 - if we sell or buy any business or assets, we may disclose your personal information to the prospective seller or buyer of such business or assets
 - if substantially all of our (or any of its affiliates') assets are acquired by a third party, in which case personal information held by Old Mutual Nigeria Life Assurance Company Limited will be one of the transferred assets
- If we are under a duty to disclose or share your personal information in order to comply with any legal obligation, any lawful request from government or law enforcement officials and as may be required to meet national security or law enforcement requirements or prevent illegal activity.
- In order to enforce or apply our terms and conditions or any other agreement or to respond to any claims, to protect our rights or the rights of a third party, to protect the safety of any person or to prevent any illegal activity.
- To protect the rights of the Old Mutual Nigeria Life Assurance Company Limited and our staff, stakeholders or other persons. This may include exchanging personal information with other organizations for the purposes of fraud protection and credit risk reduction.

Retention of your personal information

We keep your personal information for no longer than necessary for the purposes for which the personal information is processed or as required by law or regulation. The length of time we retain personal information for depends on the purposes for which we collect and use it and/or as required to comply with applicable laws and to establish, exercise or defend our legal rights.

How we keep your personal information secure

The main risk of our processing of your personal information is if it is lost, stolen or misused. This could lead to your personal information being in the hands of someone else who may use it fraudulently or make public information that you would prefer to keep private.

For this reason, Old Mutual Nigeria Life Assurance Company Limited is committed to protecting personal data from loss, misuse, disclosure, alteration, unauthorized access, unavailability and destruction and takes all reasonable precautions to safeguard the confidentiality of personal data, including through use of appropriate organizational and technical measures. Organizational measures include physical

access controls to our premises, implementing internal policies and staff training and ensuring confidentiality obligations are imposed on our employees and third parties. Technical measures include requiring passwords for access to our systems, and the use of encryption and anti-virus software. We are committed to ensuring the confidentiality of the personal information that we hold and we continue to review our security controls and related policies and procedures to ensure that your personal information remains secure.

In the course of provision of your personal information to us, your personal information may be transferred over the internet. Although we make every effort to protect the personal information that you provide to us, the transmission of information over the internet is not completely secure. As such, you acknowledge and accept that we cannot guarantee the security of your personal information transmitted to our website and that any such transmission is at your own risk.

Use of cookies

Our website uses cookies. A cookie is a piece of data stored on your computer's hard drive that identifies your computer while you are using our site.

Cookies have a number of uses, for example, cookies can be used for analytics purposes to estimate the number of users to our website. They may also be used for other purposes, such as to maintain the security of the site and provide information on what we need to do to provide administration support to the website.

We provide specific details about the cookies we use and the reasons for using these cookies in our Cookie Policy to enable website visitors to make an informed decision when using our website. In respect of third-party cookies, we have no control over how third-party cookies act, or whether that third party uses any other cookies. We advise you to check the privacy notices of any such third parties before providing any data to them.

Your rights

You have the right to ask us:

- For a copy of the personal information we hold about you: You have a right of access to any personal information we hold about you. You can ask us for a copy of your personal information; confirmation whether your personal information is being used by us and details about how and why it is being used.

- To update or correct your personal information: You have a right to request an update to any of your personal information that is out of date or incorrect.
- To delete your information, to the extent permitted by law: You have a right to ask us to delete any personal information which we are holding about you in certain specific circumstances.
- To restrict processing of your personal information where appropriate: You have a right to ask us to restrict the way that we process your personal information. To update or correct your personal information

In certain circumstances, you also have the right to:

- Withdraw your consent for the processing of your personal information: if we are relying on consent and have no other legal grounds for processing your personal information, you can withdraw your consent.
- Object to the processing of your personal information: You have a right to ask us to consider any valid objections which you have to our use of your personal information where we process your personal information on the basis of our or another person's legitimate interest, or where we use your personal information for profiling purposes.
- Object to automated decision making and profiling.
- Data portability: Where we use your personal information on the basis of your consent or performance of a contract, you have a right to ask us to provide your personal information to a third-party provider of services.

We will consider all such requests and provide our response within a reasonable period (and in any event within the period allowed by applicable law). Please note, however, that certain personal information may be exempt from such requests in certain circumstances, for example if we need to keep using the information to comply with our own legal obligations or to establish, exercise or defend legal claims.

We may request you provide us with information necessary to confirm your identity before responding to any request you make. If an exception applies, we will tell you this when responding to your request.

Transfers of personal information

The personal information we process may be used, stored and/or accessed by staff working for us, other members of the Old Mutual Nigeria Life Assurance Company Limited or third-party partners providing services to us, or performing services on our behalf. Further details on to whom your personal information may be disclosed are set out above.

When we contract with third parties, we require that they have appropriate security, privacy and confidentiality measures in place to ensure that personal information is kept secure.

How to contact us

If you would like any more information about the way we use your information, or if you wish to exercise the rights listed above, please contact us using the details below:

Mary Aworetan
Head Information Technology
Old Mutual Limited
19A Adeola Odeku
Victoria Island Lagos
Nigeria
Email: maworetan@oldmutualnigeria.com

You have a right to complain to the Information Regulator if you think that your information has been misused. The contact details are:

National Information Technology Development Agency
Tel: +234929220263, +2348168401851, +2347052420189
Website: www.nitda.gov.ng

Changes to our Privacy Policy

We may change this privacy notice from time to time. We will post any changes on our website.

Please check back frequently to see any updates or changes to our privacy notice. By continuing to use our website and interact with you. You are confirming that you have read and understood the latest version of our privacy notice.

Old Mutual Limited Cookie Policy

What are Cookies?

Cookies are small files placed on your computer by websites and emails. They allow useful pieces of information to be provided to website owners, which enable you to use websites more efficiently and to save time (for example, by not having to input your details each time you visit the site).

Cookie types

Strictly necessary	These are cookies that are required for the operation of our website
Analytical/performance	These cookies allow us to recognize and count the number of visitors and to see how visitors move around our website when they are using it. This helps us, and third parties, to improve the way our website works
Functionality	These cookies are used to recognize you when you return to our website. This enables us to personalize our content for you
Targeting	These cookies record your visit to our website, the pages you have visited and the links you have followed. We may also share this information with third parties

Cookie Scope

Cookies can expire at the end of a browser session (from when a user opens a browser window to when they exit the browser) or they can be stored for longer.

Session Cookies - Allow websites to link the actions of a user during a browser session. These session cookies expire after a browser session so would not be stored long term. For this reason, session cookies may sometimes be considered less privacy intrusive than persistent cookies.

Persistent cookies - Are stored on a users' device in between browser sessions, which allows the preferences or actions of the user across a site (or in some cases across different websites) to be remembered. Persistent cookies may be used for a variety

of purposes including remembering users' preferences and choices when using a site or to target advertising.

Some cookies that we use will collect personal information about you. Any personal information that is collected will be used in accordance with our Privacy Notice.

Cookie Sources - First vs. Third party

Whether a cookie is 'first' or 'third' party refers to the website or domain placing the cookie.

First party cookies in basic terms are cookies set by a website visited by the user - the website displayed in the URL window. Our website may place, and access certain first party cookies on your computer or device.

First party cookies are those placed directly by us and are used only by us. We use cookies to facilitate, and improve your experience of our website. We have carefully chosen these cookies and have taken steps to ensure that your privacy and personal information is protected and respected at all times.

Third party cookies are cookies that are set by a domain other than the one being visited by the user. If a user visits a website and a separate company sets a cookie through that website this would be a third-party cookie. We have no control over how third-party cookies act, or whether that third party uses any other cookies. We advise you to check the privacy notices of any such third parties before providing any data to them.

Managing Cookies

By using this website, you agree that we can place cookies on your computer or other device. You may refuse the use of cookies on www.oldmutual.com.ng by selecting the appropriate settings in your browser, but you may lose some useful functionality. For more information about cookies, please visit the All about Cookies website which gives details on how to delete cookies from your computer.

Google Analytics

This website uses Google Analytics, which is a web analytics service provided by Google. Google Analytics enables us to recognize repeat visitors to the site and to analyze how users use the site. The information generated by the cookie about your use of the website will be transmitted to and stored by Google. Google uses this information for the purpose of evaluating your use of the website, compiling reports on website activity for website operators and providing other services relating to website activity and internet usage. Please note that Old Mutual Limited has switched on the IP Anonymisation feature in Google Analytics.

YouTube cookies

We embed videos from our official YouTube channel and this may set cookies on your computer once you click on the YouTube video player. To find out more please visit YouTube's embedding videos information page.

Advertising cookies

We may use advertising cookies to help us deliver more relevant, targeted online advertising. This means that based on the pages you visit on our site; you may see our advertisements on selected other websites. The information collected is anonymous and does not contain any personal information.