



CAPITAL EXPRESS INDEMNITY  
INSURANCE LIMITED

## **CAPITAL EXPRESS INDEMNITY INSURANCE LIMITED**

### **DATA PRIVACY POLICY**

#### **PREAMBLE**

Capital Express Indemnity Insurance Limited ("we" or "our" or "the Company") is registered with the Cooperate Affairs Commission, committed to protecting your personal information in line with regulatory requirements. As a provider of insurance services, respectful and appropriate use of personal information is critical to our business. This Privacy Protection Policy sets out general information about how we handle the personal information that we hold and how you can contact us about them. In this Privacy Protection Policy, the words "we", "us" and "our" mean Capital Express Indemnity Insurance Limited.

#### **Your Trust is Our Priority**

When you use our services, you entrust us with your information. We understand this is a significant responsibility and strive to safeguard your information while empowering you with control. This Privacy Policy explains what data we collect, why we collect it, and how you can manage, access, and delete your information.

#### **WHEREAS:**

- A. This Policy is established in compliance with: Section 37 of the Constitution of the Federal Republic of Nigeria (CFRN) 1999 (as amended), The Nigeria Data Protection Act (NDPA), 2023 and all other applicable data privacy legislation.
- B. It outlines our approach to data privacy principles when processing the personal data of:
  - i. Customers/Client
  - ii. Staff
  - iii. Vendors
  - iv. Visitors
  - v. Any third party interacting with us
- C. For individuals, this Policy emphasizes their rights under the NDPA. It applies to all data subjects whose personal data we collect and process.

#### **D. Data Protection Officer and Employee Responsibilities.**

The Company's designated Data Protection Officer (DPO) is accountable for ensuring this Policy's accuracy and timeliness. The DPO also oversees proper notification of data subjects before data collection and processing, including data collected through our website. All employees who handle personal data must adhere to the provisions outlined in this Policy.

### **ARTICLE 1: OUR COMMITMENT TO DATA PROCESSING PRINCIPLES**

We are committed to processing your personal data in accordance with the principles outlined in Section 24 of the Nigeria Data Protection Act (NDPA) 2023. These principles ensure that your data is handled:

- i. Fairly, lawfully, and transparently: We will always obtain your consent or rely on another lawful basis for processing your data. We will also be transparent about how your data is used.
- ii. For specified, explicit, and legitimate purposes: We will only collect and process your data for the purposes we have clearly communicated to you, and we will not use it for any other reason without your consent.
- iii. Adequately, relevantly, and limited to what is necessary: We will only collect the minimum amount of data necessary to fulfill the purpose for which it is collected.
- iv. Accurately and kept up to date: We will take reasonable steps to ensure your data is accurate and, where necessary, kept up to date.
- v. In a manner that ensures appropriate security: We will implement robust security measures to protect your data against unauthorized access, disclosure, alteration, or destruction.

### **Beyond Compliance: Accountability and Data Protection Triad**

Furthermore, we go beyond compliance with the NDPA 2023. We are committed to demonstrating accountability in our data processing practices and upholding the data protection triad of confidentiality, integrity, and availability. This means we will be responsible for our actions and ensure your data remains confidential, accurate, and accessible when needed.

### **ARTICLE 2: - CONSENT OF DATA SUBJECT**

We respect your right to control your personal data. Subject to legal requirements, your consent is our primary justification for processing your data. You have the right to grant, withhold, or withdraw your consent at any time.

For a detailed explanation of consent in data processing, please refer to Sections 26, 34, 36, and 38 of the Nigeria Data Protection Act (NDPA) 2023.

## ARTICLE 3: - OUR SCOPE OF DATA PROCESSING

**3.1.** We collect and hold a range of personal information about our customers and people from our business partners, suppliers, and service providers. The table below outlines the different categories of personal data we collect, the purposes for which we collect it, and the lawful basis for processing that data. Please kindly note that this is not an exhaustive list, and we comply with the NDPA 2023 while respecting your rights.

**Table 3**

S/N	PURPOSE OF COLLECTION	TYPE OF DATA	LAWFUL BASIS
1	IDENTIFICATION	Full name, title, marital status, phone number, email address, contact address, social media handles, gender, date of birth, an identification document such as a copy of driver's license, international passport, national identity card, voter's card, signature, postal address, educational record, billing address, personal information of next of kin and guarantor(s)	<b>LEGAL OBLIGATION</b> Some instances may involve public interest while some may require consent as prescribed by the NDPA 2023.
2	NOTIFICATIONS/ CONTACT		
3	FINANCIAL DATA	Bank account details, Bank Verification Number (BVN), biometrics, and payment card details, TIN (tax identification number), superannuation, and other insurance policy information.	<b>CONSENT</b> Consent (may also involve Legitimate Interest or Legal Obligation for security analytics)
4	SECURITY (FOR SAFETY AND SECURITY OF LIVES AND PROPERTY)	Name, phone number, emails address, contact address, sex, date of birth, video recordings/still images from CCTV cameras and passport.	<b>LEGAL OBLIGATION</b> Legal Obligation (may also involve Legitimate Interest or Public Interest for security analytics)
5	EMPLOYMENT	Name, phone number, email address, contact address, sex, date of birth, passport, medical record, educational record and details of referees/guarantors.	<b>CONTRACT</b> This is the major lawful basis. Some instances may involve other lawful basis such as consent, vital interest or legal obligation.
6	CONTRACT	Name, phone number, email address, contact address, sex,	<b>CONTRACT</b> Some instances may involve legitimate interest or public

S/N	PURPOSE OF COLLECTION	TYPE OF DATA	LAWFUL BASIS
			interest - particularly in carrying out due diligence.
7.	TRANSACTION	Details about payments to and from you and other details of products and services you have subscribed to.	<b>LEGAL OBLIGATION</b> Legal Obligation (may also involve Legitimate Interest or Public Interest for security analytics)
8.	TECHNICAL USE	Internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website.	
9.	PROFILE DATA	your username and password, your interests, preferences, feedback and survey	
10.	USAGE DATA	information about how you use our website, products and services.	
11.	MARKETING AND COMMUNICATIONS DATA	your preferences in receiving marketing from us and our third party and your communication preferences.	

**3.2 SENSITIVE INFORMATION:** Sometimes we need to collect and hold sensitive information about you, for example when you are applying for an insurance product. This will generally include information about your health, activities that may impact your health, your health history, fitness, and physical activities. We may also give you the access to provide your voiceprint to identify yourself to our call centers.

Sensitive information can include details on a person's health, racial or ethnic origin, political inclinations, and membership of a political association, religious beliefs or affiliations, philosophical beliefs, membership of a professional body or trade association, criminal record, health information, genetic or biometric information.

We only collect and hold sensitive information with your consent or in other limited situations which the law allows.

#### **ARTICLE 4:- How Capital Express Indemnity Insurance Limited collects Your Information**

**Directly from You:** We often collect personal information when we engage a prospect directly. For example, we might collect your personal information when you fill out a form with us, call us, meet with one of our agents or use our website. See the 'Online services' section below for more information about our collection of personal information online.

**From third Party or Agent:** our Agents, insurance brokers, other Insurers and reinsurers, medical practitioners or medical facilities, your relatives and representatives

- i. **Inquiries and Other Communications:** We collect information when you make inquiries or send any other communication to Capital Express Indemnity Insurance Limited directly or indirectly through social media platforms. E.g. if you log in for our services using your social media profile.
- ii. **Devices:** including wearable devices in relation to which you agree to provide personal information to us.
- iii. **External dispute regulation bodies and public sources;** this includes Statutory or government organizations and public registers. If you provide us with personal information about another person, you should obtain their consent to do so, having informed them of this privacy protection policy where appropriate.
- iv. **Service providers:** information brokers, investigators, lawyers, financial advisers. Doctors and other medical and occupational experts.
- v. **Relatives and representatives**
- vi. **Medical practitioners or medical facilities.**
- vii. **Regulators:**
- viii. **Credit reporting agencies or information providers**
- ix. **Your employer or related corporate organizations.**

#### **4.1 Website Browsing:**

Capital Express Indemnity Insurance Limited's websites use cookies to track browsing history of visitors to improve their experience. All Capital Express Indemnity Insurance Limited websites provide visitors with 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. In the case of Capital Express Indemnity Insurance Limited'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. For children's personal data, consent will be sought from their legal guardian(s)

#### **4.2 From Third Parties and Public Sources:**

- i. **Technical Data:** We may obtain technical data about your device from analytics providers, advertising networks, and search information providers.
- ii. **Contact, Financial, and Transaction Data:** We may collect contact, financial, and transaction data from providers of technical services, payment processors, credit bureaus, and anti-fraud services.
- iii. **Financial Crime Prevention:** We use third-party services to verify information related to financial crime, fraud, sanctions, and Politically Exposed Persons (PEPs).

#### **4.3 Recordings and Images:**

- i. **Phone Calls:** We may record or monitor your phone calls with us for regulatory compliance, training purposes, quality assurance, staff and customer safety, and to resolve queries or issues.
- ii. **CCTV:** We use CCTV cameras on our premises for the safety and security of our staff and customers.

#### **Social Media Platforms**

The data subject may wish to participate in the various blogs, forums, and other social media platforms hosted by Capital Express Indemnity Insurance Limited ("Social Media Platforms") which are made available to the data subject. The main aim of these Social Media Platforms is to facilitate and allow the data subject share content.

However, Capital Express Indemnity Insurance 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.

#### **Storage and security of personal information**

We store information in different ways, including electronic and non-electronic formats. The security of your personal information is important to us, and we take reasonable steps to protect it from misuse, interference, and loss, and from unauthorized access, modification, or disclosure, including control of access to our buildings and electronic security systems, such as firewalls and data encryption on our websites.

We may store personal information physically or electronically with third party data storage providers or our service providers. Where we do this, we use contractual arrangements to ensure

#### **ARTICLE 5: - DATA SUBJECT RIGHTS**

We take your data privacy rights seriously. In addition to the right to grant, withhold, or withdraw consent, you have the following rights under the Nigeria Data Protection Act (NDPA) 2023 (Sections 34 and 35):

- i. **Right to Access:** You have the right to request a copy of the personal data we hold about you.
- ii. **Right to Rectification:** You can request that we correct any inaccurate or incomplete personal data we possess.
- iii. **Right to Object:** You have the right to object to how we use your personal data, in certain situations. You can also request that we limit the way we use your information.
- iv. **Right to Data Portability:** You can request a copy of your personal data in a format that allows you to easily transfer it to another service provider.
- v. **Right to Erasure:** You have the right to request that your data be deleted from our systems.
- vi. **Right to Restrict Processing:** You have the right to request that we restrict the processing of your personal data in certain situations.
- vii. **Right to Object to Automated Decision-Making:** You have the right to object to automated decisions made about you and to request human intervention.
- viii. **Right to Withdraw Consent:** You have the right to withdraw your consent to the processing of your data at any time; To opt-out of interest-based advertising by advertisers on our services visit <http://ceil.ng/cookies> or you can unsubscribe from our marketing email list at any time by clicking on the unsubscribe link in the emails that we send or by contacting us using the details provided below in Article 22 of this policy.

For detailed information on these rights and the complaint process, please refer to Part VI of the NDPA 2023.

## **ARTICLE 6: DATA RETENTION AND SECURITY**

### **6.1 Commitment to Data Protection**

We are committed to protecting your personal data in accordance with the Nigeria Data Protection Act (NDPA) 2023. We implement appropriate technical and organizational measures to ensure the security, integrity, confidentiality, availability, and resilience of your data.

### **6.2 Data Retention Periods**

The retention period for your personal data is determined by the purpose for which it is collected. We only collect and store data that is:

- i. **Necessary:** We limit data collection to what is reasonably required by law or best practice to serve you or respond to inquiries about our transactions with you.
- ii. **Legitimate:** We only process data for purposes that are lawful and have a justified basis.

We take our responsibility to protect your privacy very seriously. This commitment aligns with your right to privacy as guaranteed by the 1999 Constitution of the Federal Republic of Nigeria and international human rights law.

The following table outlines the typical retention periods for different categories of data. Please note that these are general guidelines, and the specific retention period for your data may vary depending on the circumstances.

NO.	TYPE OF DATA	RETENTION TIMELINE	JUSTIFICATION
1.	CUSTOMER RECORDS	Subject to Article 3 and Article 16 of this policy; we will retain your data only for as long as necessary to fulfill the purposes for which it was collected, and in accordance with our legal obligations. This typically means for the duration of your use of our products or services. After that, your data will be securely deleted or anonymized, unless we are required by law to retain it for a longer period (up to 10 years).	To fulfill contractual obligations and provide ongoing services. The data may be retained longer for legal or regulatory compliance
2.	NOTIFICATIONS AND COMMUNICATIONS		
3.	EMPLOYMENT RECORDS		
4.	CONTRACT RECORDS		
5	Transaction/Usage/ Profile Data	Subject to Article 3 and Article 16 of this policy; we will retain your data only for as long as necessary to fulfill the purposes for which it was collected, and in accordance with our legal obligations. This typically means for the duration of your use of our products or services. After that, your data will be securely deleted or anonymized, unless we are required by law to retain it for a longer period.	To fulfill contractual obligations, Legitimate/Public Interest, national security and to continue to provide ongoing services. The data may be retained longer for legal or regulatory compliance
6.	Technical Data		
7.	Security Data		



Note further that when your personal data is no longer needed or beyond the stipulated retention period or where there is no law mandating us to further maintain the records, the bank will delete or destroy it from its systems and records or take steps to securely archive it while protecting your identity and privacy rights as the case may be.

## **ARTICLE 7: - MANDATORY DATA COLLECTION**

Certain types of personal data are essential for us to fulfill our contractual obligations or legal requirements towards you. Without this information, we may be unable to provide the services you expect.

For further clarification of our data processing practices, please contact our designated Data Protection Officer (DPO) as detailed in Article 12 of this policy below.

## **ARTICLE 8: - TRANSFER OF DATA TO A THIRD-PARTY**

The world today is interconnected and so is the provision of banking services. For instance, there could be many counterparties involved for a card transaction to be successfully completed. These include the personalization companies, the switching companies, processors, acquirers, merchants, and the card schemes. Certain personal data will traverse these parties in the normal course of carrying out transactions. Save as related to the provision of banking services and meeting legal, regulatory, contractual, and other uses tangential or incidental to these, the bank will not share your personal data with a third party. Where it becomes necessary to do so, adequate security measures will be taken to protect the data from access by recipients other than those for which it is intended.

### **8.1 Third-Party Services Offered Through Our Platform**

Capital Express Indemnity Insurance Limited may partner with third-party service providers who offer valuable services to you through our platform. These providers will rely on their own lawful bases for processing your personal data in connection with these services. The types of data typically processed may include your contact information.

### **8.2 Your Right to Control Your Data**

For any services that relies on your consent, you have the right to decline participation and further restrict the processing of your personal data. You can easily unsubscribe from any promotional communications related to these optional services.

## **ARTICLE 9: - TECHNICAL INFORMATION AND COOKIES**

### **9.1 Website Data Collection and Cookies**

Our website, like many others, collects certain information from visitors. This includes your IP address and other standard browsing data that your web browser shares with websites you visit. This information helps us understand user behavior and improve your website experience.

## **9.2 Cookies and Your Preferences**

Cookies are small text files downloaded to your device (computer or phone) when you visit a website. They store a limited amount of data and serve the purpose of remembering your preferences. This can be helpful, as cookies can pre-populate choices you've made previously, even across different browsing sessions. However, it's important to note that not all websites use cookies responsibly.

## **9.3 Our Commitment to Privacy**

We are committed to respecting your privacy rights under the NDPA 2023. All methods we employ to automatically interact with you on our website are designed to do so without compromising your privacy. This includes ensuring our cookies have robust security protocols in place to prevent any potential misuse.

# **ARTICLE 10: - PERSONAL DATA SECURITY AND INTEGRITY**

## **10.1 Data Security and Regulatory Compliance**

Capital Express Indemnity Insurance Limited is committed to safeguarding your personal data using the latest security technologies and robust protocols. We employ a multi-layered approach to prevent cyberattacks, unauthorized access, data loss, or corruption.

## **10.2 Meeting Legal Requirements**

We understand our legal obligations under the Nigeria Data Protection Act (NDPA) 2023. We actively fulfill these obligations through:

- i. Compliance with the Nigeria Data Protection Act 2023
- ii. Conducting Data Privacy Assessment
- iii. Employee training on data protection practices
- iv. Obtaining strict data security warranties from vendors (where applicable)

## **10.3 Measures to keep you data's integrity and in confidence**

- I. The Bank shall establish adequate controls in order to protect the integrity and confidentiality of Personal Data, both in digital and physical format and to prevent personal data from being accidentally or deliberately compromised.

- II. Personal data of Data Subjects must be protected from unauthorized viewing or access and from unauthorized changes to ensure that it is reliable and correct.
- III. Any personal data processing undertaken by an employee who has not been authorized to carry out such as part of their legitimate duties is unauthorized.
- IV. Employees may have access to Personal Data only as is appropriate for the type and scope of the task in question and are forbidden to use Personal Data for their own private or commercial purposes or to disclose them to unauthorized persons, or to make them available in any other way.
- V. Human Resources Department shall inform employees at the start of the employment relationship about the obligation to maintain personal data privacy. This obligation shall remain in force even after employment has ended.

#### **10.4 Data Breach Notification**

In accordance with the NDPA 2023, we are required to report any data breach that poses a high risk to your rights and freedoms to the Nigerian Data Protection Commission within 72 hours of becoming aware of the incident. This allows for immediate action and rectification.

For further information on these requirements, please refer to Sections 28, 39, and 40 of the NDPA 2023.

### **ARTICLE 11: - JOB APPLICANTS**

#### **11.1 Application Information**

When you apply for a position at Capital Express Indemnity Insurance Limited, you will be required to submit the following information such as Name and contact details, educational background and work history, Other relevant background information for your application and Personal details of referees, next of kin, and guarantors. Providing this information is essential for us to process your application.

#### **11.2 Data Usage for Recruitment**

Capital Express Indemnity Insurance Limited uses the information you submit to evaluate your suitability for the position you have applied for. This includes:

- i. Assessing your skills and experience against the job requirements
- ii. Tracking feedback and interactions throughout the recruitment process

We may also use this data to analyze internal recruiting processes to:

- i. Identify effective recruitment sources
- ii. Improve integration and training programs
- iii. Enhance the interview model for better hiring decisions

### **11.3 Optional Communications and Data Sharing**

With your consent, we may use your information to communicate about Capital Express Indemnity Insurance Limited events and send you relevant publications. We may also share your data with affiliated companies and third-party service providers (e.g., recruitment agencies, background check providers, IT system providers) located in or outside your country of residence.

### **11.4 Data Retention**

We retain your application data for a maximum period of three years.

### **11.5 Data Subject Rights and Contact**

To exercise your data subject rights or request deletion of your information, please contact our Data Protection Officer at [dpo@ceiil.ng](mailto:dpo@ceiil.ng)

## **ARTICLE 12: - MAINTAINING ACCURATE INFORMATION**

We strive to maintain accurate and up-to-date personal data about our users. If your personal information changes during your relationship with Capital Express Indemnity Insurance Limited, please notify us promptly. You can easily update your information by contacting our Data Protection Officer (DPO) at [dpo@ceiil.ng](mailto:dpo@ceiil.ng). This aligns with your right to rectification under the NDPA 2023.

## **ARTICLE 13: - CHILDREN'S PRIVACY**

Our services are generally not intended for children under 13. However, in some rare cases, we may offer specialized services for children. In these instances, we take extra precautions to safeguard their privacy and data security.

### **Here's what you can expect:**

- i. **Strong Data Protection Measures:** We implement robust data protection measures to ensure the confidentiality and security of any child's information we collect.
- ii. **Limited Data Collection:** We only collect the minimum amount of data necessary to provide the specialized service.
- iii. **Parental Consent Required:** In all cases involving children, we require verifiable parental consent before collecting or using any data.

For more details check the guide below.

- i. The Bank has a children's account called Kids Savings Accounts. This account is opened and run by a child's parent or guardian until the child reaches the age of seniority.

- ii. All personal information pertaining to such account is provided by the parent/ guardian.
- iii. A parent or guardian should therefore read this policy thoroughly to understand how the data provided is handled.
- iv. Students of tertiary institutions with valid identification, admission letter to a tertiary institution and passport photographs can open the Student Account. Such customers' personal data will be processed as adult data as the long as the individual is above the age of thirteen (13).
- v. Other than as related to the operation of the aforementioned children's account and student's account, the Bank does not enter into banking relationships with minors (persons under the age of 18).
- vi. We do not knowingly collect personally identifiable information from anyone under the age of 18 except under the conditions stated above or where the age of the individual cannot be determined.
- vii. If you are a parent or guardian and you are aware that your children have provided us with Personal Data, please contact us.
- viii. If we become aware that we have collected Personal Data from children without verification of parental consent, we will take steps to remove that information from computer systems.

For detailed information on the requirements for parental consent under the Nigeria Data Protection Act (NDPA) 2023, please refer to Section 31. You may also contact our Data Protection Officer (DPO) for further clarification.

#### **ARTICLE 14:- CAVEAT ON WEBSITE LINKS**

Our website may contain links to other websites operated by third parties. These links are provided for your convenience only and do not constitute endorsement by Capital Express Indemnity Insurance Limited of the content, products, or services offered on those external sites.

Capital Express Indemnity Insurance Limited's privacy policy applies only to our website. We encourage you to review the privacy policies of any third-party websites you visit to understand their data collection and usage practices.

#### **ARTICLE 15: TRANSFER TO THIRD PARTIES AND COUNTRIES (CROSS BORDER TRANSERS)**

In carrying out our mandate effectively, we may require the services of third parties who may be within or outside the Company's jurisdiction (Nigeria). Where this is the case, the bank will enter into a Data Processing Agreement with the third party and also ask for consent if the purpose of processing was not initially stated at inception and be satisfied that the third party has adequate measures in place to protect the data against accidental or un-authorized access, use, disclosure, loss, or destruction. In such a case where the disclosure is to third parties outside the jurisdiction of the NDPA 2023, the bank will ensure that the third party meets the core global regulatory standards prior to the transfer. This may include transferring the personal data to the third party where the bank is satisfied that:

- i. The country of the recipient has adequate data protection controls established by legal or self-regulatory regime. However, in a case not covered by an adequacy decision from the NDPC;
- ii. It has a contract in place that uses existing data protection clauses with approval of NDPC to ensure adequate protection.
- iii. It is making the transfer under approved binding corporate rules

Examples of such services include but are not limited to the following:

- i. Internet connectivity,
- ii. Cloud storage,
- iii. Data analytics,
- iv. Data security, and
- v. Software development.

In transferring your data to third parties, we shall be guided by the Nigeria Data Protection Act 2023. See PART VIII of the Nigeria Data Protection Act, 2023.

#### **ARTICLE 16: DATA PROTECTION HELP DESK**

We have provided a platform to respond promptly and satisfactorily to all your requests, suggestions and complaints. We have a Data Protection Officer (DPO) who is responsible for prompt action on your data privacy. Contact the DPO via this link: [dpo@ceil.ng](mailto:dpo@ceil.ng) Our DPO serves as the internal mechanism to carry out the following services amongst others:

- i. Data protection regulations compliance and breach services
- ii. Data protection and privacy advisory services
- iii. Data protection capacity building
- iv. Data regulations contracts drafting and advisory
- v. Data protection and privacy breach remediation planning and support services

- vi. Information privacy audit
- vii. Data privacy breach impact assessment
- viii. Data protection and privacy due diligence investigation

## ARTICLE 17: DATA DELETION

You can request the deletion of your personal data at any time. We will take reasonable steps to delete your personal data upon request, subject to any legal or regulatory requirements. We have established procedures for the secure deletion of personal data that has exceeded its retention period or is no longer necessary for business purposes. These procedures are designed to ensure the complete and irreversible destruction of your data while maintaining data security. The outline of our data deletion process is as follows:

- i. **Identification:** We regularly review our data storage systems to identify personal data that has reached the end of its designated retention period or is no longer required for legal or business purposes.
- ii. **Scheduling:** Data identified for deletion is placed on a scheduled deletion list. This schedule considers the type of data, legal requirements, and potential risks associated with deletion delays.
- iii. **Overwriting:** Data slated for deletion is overwritten with random characters or patterns. This process renders the original data unreadable and unrecoverable.
- iv. **Verification:** After overwriting, we verify that the data deletion process has been successful, and the original data is no longer accessible.
- v. **Audit Trail:** We maintain an audit trail of all data deletion activities. This trail includes details like the type of data deleted, the date of deletion, and the individual responsible for the deletion.

In addition to our automated deletion processes, you can also request the deletion of your personal data at any time through our Data Subject Access Request Form. We will take all reasonable steps to fulfill your request within a commercially reasonable timeframe, subject to any legal or regulatory requirements. There may be certain situations where we are unable to completely delete your personal data. This may occur if: -

- i. We are required by law to retain your data for a specific period.
- ii. The data is necessary to resolve a legal dispute or enforce our terms of service.
- iii. The data has been anonymized and is no longer personally identifiable.

In these cases, we will take steps to limit the processing of your data to the extent necessary.

## **ARTICLE 18- DATA SUBJECT ACCESS REQUEST**

### **18.1 Data Subject Access Requests (DSARs)**

A Data Subject Access Request (DSAR) allows you to access your personal data held by Capital Express Indemnity Insurance Limited. This data may include your name, contact information, demographics, and any other information that can directly or indirectly identify you.

### **18.2 Submitting a DSAR**

You can submit a DSAR in two ways:

- i. Email: Send an email to [dpo@ceil.ng](mailto:dpo@ceil.ng) clearly specifying the information you are requesting.
- ii. DSAR Form: Contact the DPO for the DSAR form, fill and email to [dpo@ceil.ng](mailto:dpo@ceil.ng)

### **18.3 Verification Process**

To protect your privacy and ensure we provide access to the correct data subject, we may request additional information to verify your identity. This verification process may involve:

- i. Requesting identification documents (e.g., driver's license, international passport, national identity number slip (NIN))
- ii. Verifying information associated with your account
- iii. Response Timeline

We strive to respond to your DSAR within 30 days of confirmation. Our response will include:

- i. Confirmation of your request
- ii. The requested information in a clear, concise, and electronic format
- iii. Reasons for Denying Access

In rare instances, we may be unable to provide the information you have requested. We will explain the reason for denial in such cases.

### **18.4 Fees**

There is no charge for submitting a DSAR. However, a fee may be applied for requests that are:

- i. Clearly unreasonable
- ii. Submitted too frequently
- iii. Involve repeated requests for the same information within a short timeframe



## ARTICLE 19: REMEDIATION

Capital Express Indemnity Insurance Limited is committed to resolving any concerns you may have about your data privacy. We encourage you to report any complaints or inquiries through our Data Protection Officer (DPO), see Article 22 of this policy for the contact details.

Our DPO will promptly address your concerns and strive to provide a resolution within 7 business days. In the unlikely event that a more complex issue requires additional time, we will notify you promptly and take all necessary steps to ensure your rights and interests are protected throughout the process.

## ARTICLE 20: - ALTERATION OF PRIVACY POLICY

Capital Express Indemnity Insurance Limited (Data Controller) reserves the right to update this privacy policy periodically. These updates may be necessary to:

- i. Enhance data privacy rights for our users.
- ii. Align with evolving public interest considerations.
- iii. Comply with lawful directives from the Federal Government of Nigeria.

Any revisions will be made in accordance with the safeguards outlined in the Nigeria Data Protection Act (NDPA) 2023 and the 1999 Constitution of the Federal Republic of Nigeria.

## ARTICLE 21:- DEFINITIONS AND KEY TERMS

To ensure clarity throughout this Privacy Policy, we define key terms used frequently:

- i. **Cookie:** A small piece of data stored by your web browser when you visit a website. It helps websites remember your preferences, login information, and browsing activity.
- ii. **Consent:** consent of the Data Subject means any freely given, specific, informed and unambiguous indication of the Data Subject's wishes by which he or she, through a statement or a clear affirmative action, signifies agreement to the processing of Personal Data relating to him or her.
- iii. **Capital Express Indemnity Insurance Limited ("we" or "our" or "The Company"):** The Company is located at 17, Bishop Kale Close, Victoria Island, Lagos State, Nigeria. We are your Data Controller and are responsible for your data under this Privacy Policy.
- iv. **Country:** Nigeria, the location of the company and its founder/owner.

- v. **Customer:** An individual, organization, or company that uses our services to manage relationships with their consumers or service users.
- vi. **Data Protection Officer (DPO):** means the person appointed as such under the Data Protection Laws and in accordance with its requirements. A DPO is responsible for advising Capital Express Indemnity Insurance Limited (including its employees) on their responsibilities under the Data Protection Laws, for monitoring compliance with Data Protection Law.
- vii. **Device:** Any internet-connected gadget like a phone, tablet, computer, or anything else used to access our website and services.
- viii. **Internet Protocol (IP) Address:** A unique identifier assigned to every device connected to the internet. It can sometimes reveal the general geographic location of a device.
- ix. **Closed-Circuit Television (CCTV):** We make use of CCTV at our various addresses to ensure your safety and security, wherein we store video clips and still images for security purposes.
- x. **Personnel:** Our employees or those contracted to perform services on our behalf.
- xi. **Data:** means characters, symbols and binary on which operations are performed by a computer, which may be stored or transmitted in the form of electronic signals, stored in any format or any device.
- xii. **Personal Data:** means any information relating to an identified or identifiable natural person ('Data Subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person; It can be anything from a name, address, a photo, an email address, bank details, posts on social networking websites, medical information, and other unique identifier such as but not limited to MAC address, IP address, IMEI number, IMSI number, SIM, Personal Identifiable Information (PII) and others;
- xiii. **Service:** The services provided by Capital Express Indemnity Insurance Limited, as described in our terms and conditions means the Company's products and services provided to the customers.
- xiv. **Third-Party Service:** Advertisers, contest sponsors, marketing and promotional partners, and others who provide content on our platform or offer products/services we believe might interest you.
- xv. **Data Subject (You):** An individual or entity registered with Capital Express Indemnity Insurance Limited to use our services.

## **ARTICLE 22: - CONTACT**

### **Data Controller**

Capital Express Indemnity Insurance Limited

17, Bishop Kale Close, Victoria Island, Lagos State, Nigeria.

[dpo@ceil.ng](mailto:dpo@ceil.ng)

If you have any questions, comments and requests regarding your privacy and rights, please let us know how we can help:

Data Protection Officer

[dpo@ceil.ng](mailto:dpo@ceil.ng)