

# PRIVACY POLICY

## Introduction

Last modified 24<sup>TH</sup> DAY OF JANUARY 2025

This privacy notice describes how we will collect, use, share and otherwise process your personal data in connection with your use of:

- [INSUREASE (BETA) AND VERSION 1.7.10] which was last updated on (24/01/2025) mobile application software [available on our site **OR** hosted on [Google Playstore and Apple Store]
- Any of our services that are accessible through the App unless such Services state that a separate or additional privacy notice applies to a particular Service, in which case only that privacy notice applies.

This App is not intended for children **OR** those under 18 and we do not knowingly collect data relating to children.

Please read the following carefully to understand our practices regarding your personal data and how we will treat it.

This notice is provided in a layered format so you can click through to the specific areas set out below. [Alternatively, you can download a copy of the full notice here: <https://transcapedbrokers.com/insurease-privacy-policy>

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## Important information and who we are

Transparency Scape Insurance Brokers Limited is the controller and is responsible for your personal data.

Details of which can be found here [<https://transcapedbrokers.com>]. When we use "TRANSCAPE", we are referring to TRANSPARENCY SCAPE INSURANCE BROKERS LIMITED which is the controller responsible for this App.

However, TRANSCAPE has authorized STRINGIFY CONSULTING as a development vendor to deploy and host this application on Apple store and/or Play store. This is done on a service contractual basis on behalf of TRANSCAPE and does not constitute any form of employment or agency.

According to this contractual relationship, Stringify Consulting warrants that Transparency Scape reserves total ownership of its codebase, infrastructure, and product documentations.

Please read this policy carefully. Should you have any queries about this Privacy Policy or other aspects of data protection please call:

### **Contact details**

Our full details are:

- Full name of legal entity: TRANSPARENCY SCAPE INSURANCE BROKERS LIMITED
- Name or title of [DPO **OR** data privacy manager]: Amina Nuhu
- Email address: [nuhu.amina@transcapsebrokers.com](mailto:nuhu.amina@transcapsebrokers.com)
- Postal address: 101212
- Telephone number: +234 818 767 7129

### **Changes to the privacy notice and your duty to inform us of changes**

We keep our privacy notice under regular review.

This version was last updated on [24/01/2025]. It may change and, if it does, those changes will be posted on this page and notified to you [by push notification **OR** by email **OR** when you next start the App or log onto your account]. The new notice may be displayed on-screen and you will be required to read and acknowledge the changes to continue your use of the App or the Services.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during our relationship with you. **[Please visit the [PROFILE] section of [your Account or Profile] to update your details]**

### **Third party links and sites**

Our App and Services may, from time to time, contain links to and from the websites of third parties, such as insurance companies or/and Payment gateways. Please note that these websites (and any services accessible through them) are controlled by those third parties and are not covered by this privacy notice. You should review their own privacy notices to understand how they use your personal data before you submit any personal data to these websites or use these services.

### **The data we collect about you**

We collect, use, store and transfer different kinds of personal data about you. To make it easier for you to use this privacy notice, we group these into the following categories.

- Identity Data.
- Contact Data.
- Profile Data.
- Transaction Data.
- Device Data.
- Content Data.
- Usage Data.
- Security Data.

- Cookies Data.
- Marketing and Communications Data.
- Location Data.
- Connected Data.
- Feedback Data.
- Personalisation Data.
- Competition Data.

We do not intentionally collect any special categories of personal data about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health, and genetic and biometric data).

We will collect data relating to criminal offences through the measures we take to secure and protect our App and users. Further details can be found at [Criminal offence data](#) and [special category data](#).

### How is your personal data collected?

We collect your personal data in the following way:

- **Registration.** We collect your Identity Data and Contact Data when you register your account with us.
- **Communications.** When you communicate with us via email, telephone, one of our online forms or chat we collect your Contact Data. If you contact us through the App using the chat function, we also collect [Device and Cookies Data] to operate our chat function and respond to your messages. If the communication relates to an error or problem you are having with the App or one of our Services, we will also collect [Usage Data] for diagnosis and improvement.
- **Information you generate when using our App and Services.** Each time you access and use our App and Services we collect Content, Device, Cookies, Personalisation and Usage Data. We collect Content Data where you upload it to the App or interact with the content available on the App. We collect Device, Cookies, Personalisation and Usage Data [by **[METHOD]** and using cookies and other similar technologies].
- **Information we collect through monitoring the use of our App, Sites and Services.** Each time you access and use our App and Services we collect information about that access and use, being Device, Content, Cookies, and Usage Data.
- **Additional information we otherwise collect through our App, Sites and Services where we have your consent to do so.** Where you provide your consent, we collect your Location Data on an ongoing basis while you have the App installed on your device.
- **Direct Marketing.** We collect and record Direct Marketing Data when we add you to our marketing database, you request to change your direct marketing preferences, [or] you interact with our direct marketing communications or we receive prospect information from our data broker partners.
- **Connected Data.** We collect Connected Data when you choose to connect your connected device to your account.
- **Information we receive from third parties [and publicly available sources].** We will receive personal data about you from the third parties and public sources.

- **Unique application numbers.** When you want to install or uninstall a Service containing a unique application number or when such a Service searches for automatic updates, that number and information about your installation, for example, the type of operating system, may be sent to us.

## Cookies

We use cookies (small files placed on your device) [and other tracking technologies] on the App [and in our direct marketing emails] to improve your experience and our development of the App and our Services.

Cookies are small harmless files that are transferred to your device's hard disk when you access a website. Please note that none of the cookies used on our APP collects personally identifiable information about you.

## Why you should keep cookies switched on

We would like you to keep cookies activated on your device during your visits to our APP because, without cookies enabled, we cannot guarantee that the APP, and your experience whilst visiting it, will be as good as we intend it to be.

## How to control and delete cookies

If you wish to restrict or block the cookies which are set by us, you can do so by editing your browser settings. The 'Help' function within your browser should tell you how to do so.

## How we use your personal data

We will only use your personal data when we have a lawful basis to do so. Our lawful basis for each purpose for which we use your personal data is specified below. Most commonly we will use your personal data in the following circumstances:

- **Consent.** Where you have freely consented before the processing in a specific, informed and unambiguous indication of what you want. You can withdraw your consent at any time by [accessing the **[PROFILE]** section of your Account OR contacting us.
- **Performance of a contract.** Where we need to process your personal data to perform a contract with you or where you ask us to take steps before we enter into a contract with you. Where we rely on performance of a contract and you do not provide the necessary information, we will be unable to perform your contract.
- **Legitimate interests.** Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us.
- **Legal obligation.** The Processing of personal data will be done in accordance with the provisions of the Nigeria Data Protection Act 2023.

Where we need to use your personal data to comply with a legal or regulatory obligation. Where we rely on legal obligation and you do not provide the necessary information, we may be unable

to fulfil a right you have or comply with our obligations to you, or we may need to take additional steps, such as informing law enforcement or a public authority or applying for a court order.

### Delivery and improvement of our App and purchases

Purpose or activity	Type of personal data	Lawful basis for processing
To permit you to install the App and register you as a new App user	Identity Contact Financial Device	[Performance of a contract OR Legitimate interests (delivering our App to you)]
To take steps towards providing you with services at your request, to process and fulfil in-App [orders/purchases] and deliver services to you, including managing payments and sending you service communications	Identity Contact Transaction Device [Location]	Performance of a contract
To provide you with your membership or subscription benefits, fulfil your purchase or redemption of gift cards	Identity Contact Transaction	Performance of a contract
Enforce our terms and conditions, including to collect money owed to us	Identity	Legitimate interests (to recover debts due to us)

### Account management and profiling

Purpose or activity	Type of personal data	Lawful basis for processing
Combining the information we collect about you into a single customer account profile	Contact Direct marketing	Legitimate Interests (to publicise and grow our business)

### Direct marketing

Purpose or activity	Type of personal data	Lawful basis for processing
To send you direct marketing communications via [email, text and/or push notification]	Contact Device Direct Marketing	Consent  Unless we can rely on the soft opt-in and you have not opted out, in which case we rely on Legitimate Interest (to publicise and grow our business)
To send you direct marketing communications by [telephone]	Contact Device Direct Marketing	Legitimate interests (to publicise and grow our business)

		Unless you have opted out, in which case we rely on Consent
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### Troubleshooting, improvement and security

Purpose or activity	Type of personal data	Lawful basis for processing
To administer, monitor and improve our business, Services and this App including troubleshooting, data analysis and system testing	Identity Contact Device	Legitimate interests (for running our business, provision of administration and IT services, network security, maintaining the security of our App and Services, providing a secure service to users and preventing fraudulent and other misuse of our App)
Applying security measures to our processing of your personal data, including processing in connection with the App	All personal data under this privacy notice	Applying appropriate technical and organisational measures.
Otherwise monitoring use of the App and deploying appropriate security measures	Contact Security Transaction	Legitimate interests (running our business, provision of administration and IT services, network security, maintaining the security of our App and services, providing a secure service to users and preventing fraudulent and other misuse of our App)

### Rights and obligations

Purpose or activity	Type of personal data	Lawful basis for processing
To comply with our other legal obligations, including compliance with [tax legislation, judicial, law enforcement and government authorities' requests]	All personal data under this privacy notice	Legal obligation ([OBLIGATION] under [LAW OR OTHER REQUIREMENT])

### Cookies and personalisation

Purpose or activity	Type of personal data	Lawful basis for processing
To deploy and process personal data collected via Cookies that are [strictly necessary], as set out in the cookies note.	Cookies	Legitimate interests (delivering and securing the App and our Services)

To deploy and process personal data collected via Cookies that are [not strictly necessary], as set out in the cookies note	Cookies	Consent
To deliver (personalised) advertisements to you	Personalisation	Consent

### Other communications

Purpose or activity	Type of personal data	Lawful basis for processing
To notify you of changes to the App, Services, your purchases and our terms and conditions for ongoing contracts	Contact	For ongoing or prospective contracts, Performance of a contract  Otherwise, Legitimate interests (in servicing our users and prospective users)
To notify you of updates to this privacy notice	Contact Transaction	Legal obligation; to inform you of our processing.
To respond to your requests to exercise your rights under this notice	As relevant to your request	Legal obligation; complying with data subject requests.
To enable you to participate in a prize draw or competition where applicable, please also see the separate prize or competition privacy notice when needed	Contact Direct Marketing Competition	[Legitimate interests (in growing and publicising our business)  Unless you have previously opted out, where we will rely on Consent]  [Performance of a contract (once you have entered)]
To ask you to complete a survey and process your response where applicable.	Contact	Legitimate interests (to analyse how users use our products or Services and to develop them and grow our business)  Unless you have previously opted out, where we will rely on Consent
To otherwise respond to your enquiries, fulfil your requests and to contact you where necessary	As relevant to your enquiry or request	Legitimate interests (service our users and prospective users)

### Personal data sharing

Purpose or activity	Type of personal data	Lawful basis for processing
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Share personal data with our third-party providers for purposes not otherwise set out above (see <a href="#">Disclosures of your personal data</a> )	[INSERT/CROSS REFER TO THE BELOW]	Legitimate interests (for the purpose relevant to the recipient, as set out at "Disclosures of your personal data"
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### Business contacts

Purpose or activity	Type of personal data	Lawful basis for processing
Process personal data relating to staff members of our business contacts, including suppliers, customers and prospects	Contact	Legitimate interests (servicing and receiving products or services, to or from our business contacts and carry out our day by day business)

### Automated decision making and profiling

We make the following decisions based solely on automated processing or profiling that produce legal effects concerning you (or that may have similarly significant effects):

### Criminal offence data and special category data

We do not intentionally collect criminal offence data about you. However, we may process data relating to criminal offences in monitoring the use of our App for security purposes, where we suspect you may have committed a crime, such as attempting to make a fraudulent purchase or claim or circumvent the security of the App or Services. In such circumstances we will provide that information to law enforcement and/or use it to establish, exercise or defend a legal claim. In those circumstances, according to the type of activity and purpose, we will rely on legitimate interests (protecting our business, employees and other users) and legal obligation (where required by legal, judicial or law enforcement to disclose or process that information). The law authorises that processing under the Data Protection Act 2023 and although the appropriate authorisation will depend on a case-by-case basis, monitoring for criminal behaviour through the use of our App is in the Substantial public interest (preventing or detecting unlawful acts) and processing information related to suspected criminal activity for legal claims is permitted under the additional condition of legal claims **and as** authorised under applicable national law.

### Disclosures of your personal data

We may share your personal data with the following third parties:

- **Internal third parties.** Other companies and Group acting as joint controllers or processors, who are aligned with your interest as a subscriber on the App and provide IT and system administration services and undertake leadership reporting.
- **External third parties.**
  - Your App store Provider and mobile network operator to allow you to install the App.
  - Service providers [acting as processors] who provide IT and system administration services, hosting services for our App, delivery and logistics services, payment processing, fraud and identity verification providers, customer service support, email delivery and administration, and data storage and analysis.



- Our professional advisors including lawyers, auditors, insurers, consultants and [OTHER ADVISORS] who provide legal, accounting, insurance and [OTHER] services.
- Your service providers that you have appointed and we need to contact to fulfil your requests, such as your banking or payment card provider to process your transactions.
- Marketing and promotional partners and co-operatives acting as processors or controllers or joint controllers with whom we share data to enhance our offerings and identify prospective customers.
- Third party partners where you have expressly subscribed to receive marketing from or with them.
- Specific third parties listed in the table Purposes for which we will use your personal data above **OR** such as [SPECIFIC THIRD PARTIES] acting as controller or processor.
- Third parties to whom we may choose to sell, transfer or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy notice.
- Regulators, law enforcement, public authorities or other third parties acting as controllers and where necessary to exercise our rights or comply with a legal obligation.

### **International transfers**

We do not transfer your personal data outside Nigeria. Also where we transfer your personal data between our group companies, we ensure your personal data is protected by requiring all our group companies to follow the same rules when processing your personal data.

### **Data security**

All information you provide to us is stored on our secure servers and located in Nigeria. Any payment transactions carried out by us or our chosen third-party provider of payment processing services will be encrypted using [Secured Sockets Layer (SSL) technology **OR** [ALTERNATIVE ENCRYPTION TECHNOLOGY]].

Where we have given you or where you have chosen a password that enables you to access certain parts of our App or Services, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

Once we have received your information, we will use strict procedures and security features to protect your personal data from loss, unauthorised use or access.

[We will collect and store personal data on your device using [application data caches and browser web storage (including HTML5) **OR** [ALTERNATIVE MECHANISMS]] and other technology.]

Certain Services include social networking, chat room or forum features. Ensure when using these features that you do not submit any personal data that you do not want to be seen, collected or used by other users.

We have put in place procedures to detect and respond to personal data breaches and notify you and any applicable regulator when we are legally required to do so.

## Data retention

Once we no longer have a legal right to hold your personal data, we will delete or, in some circumstances, we will anonymise your personal data so that it can no longer be associated with you for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

If you do not use the App for a period of **[TIME PERIOD]** then we will treat the account as expired and will delete your personal data.

## Your legal rights

You have the following rights under data protection laws in relation to your personal data.

- **Access.** Request access to and/or a copy of the personal data we process about you (commonly known as a data subject access request). This enables you to check that we are lawfully processing it.
- **Correction.** Request correction of any incomplete or inaccurate data we hold about you. (We may need to verify the accuracy of the new data you provide to us.)
- **Deletion.** Request us to delete or remove personal data where there is no good reason for us continuing to process it. You also can ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we have processed your information unlawfully or where we need to erase your personal data to comply with law. (In some cases, we may need to continue to retain some of your personal data where required by law. If these apply, we will notify you at the time of our response.)
- **Objection.** Object to us processing your personal data where (a) we are relying on legitimate interests as the lawful basis and you feel the processing impacts on your fundamental rights and freedoms, or (b) the processing is for direct marketing purposes. In some cases, we may refuse your objection if we can demonstrate that we have compelling legitimate grounds to continue processing your information which override your rights and freedoms.
- **Restriction.** Request that we restrict or suspend our processing of your personal data:
  - if you want us to establish the data's accuracy;
  - where our use of the data is unlawful, but you do not want us to erase it;
  - where we no longer require it, but you need us to hold onto it to establish, exercise or defend legal claims; or
  - You have objected to our use of your data, but we need to verify whether we have overriding legitimate grounds to use it.
- **Data portability.** Request we transfer certain of your personal data to you or your chosen third party in a structured, commonly used, machine-readable format. This right only applies to information processed by automated means that we process on the lawful bases of consent or performance of a contract.
- **Withdraw consent.** Withdraw your consent at any time where we are relying on consent to process your personal data. Please know that this does not affect the lawfulness of any processing carried out before you withdraw your consent, and after withdrawal, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent. You can also delete your account from the App as a way of you withdrawing consent.

- **Complain to Nigeria’s data protection regulator.** If you are unhappy with how we process your personal data, you have a right to lodge a complaint with the Nigeria Data Protection Commission. However, we ask that you contact us first using the details below so that we have the chance to put it right.

You can exercise any of these rights at any time by contacting us [at [EMAIL ADDRESS] **OR** by using the request form at [LINK]].

### Description of categories of personal data

- **Identity Data:** first name, last name, title, date of birth and Profile Data.
- **Contact Data:** first name, last name, contact address, email address and telephone numbers, your communication preferences and copies of the communications between you and us.
- **Profile Data:** your email address, username and password.
- **Transaction Data:** billing and delivery addresses, payment card details, history of your payments, purchases, deliveries, returns and refunds and the applicable terms and conditions of your purchases.
- **Device Data:** [the type of device you use,] [your unique device identifier,] [mobile network information,] [your mobile operating system,] [the type of mobile browser you use,] [IP address,] [time zone setting,] [and] [**OTHER INFORMATION**].]
- **Content Data:** information that you store [or generate] in the App, being [photos, videos and associated metadata, check-ins, posts and messages.]
- **Usage Data:** logs and detail of your use of our Apps and Services, being the dates and times on which you download, access and update the App and our Services, any error or debugging information, [and the resources that you access] and the actions we and you take in relation to them and Cookies Data.
- **Security Data:** information we collect about your use of the App, our Services and our Sites in order to ensure your and our other users' safety and security, being Usage Data, the Cookies Data generated by [CATEGORY OF COOKIE] and the information provided to us by our payment processing provider.
- **Cookies Data:** the information collected through the cookies and similar technologies.
- **Direct Marketing Data:** your direct marketing preferences, consents for receiving direct marketing from us and/or our third parties and the history of the direct marketing communications we have sent to you.
- **Location Data:** your current location as disclosed by [GPS technology WiFi connections, your IP address **OR** [OTHER TECHNOLOGY]] for the time period where you have permitted us to collect it.
- **Connected Data:** information stored on your Device that you permit the App to connect to, being [Contacts lists,] [login information,] [and] [OTHER INFORMATION].]
- **Feedback Data:** your feedback and survey responses.
- **Personalisation Data:** Cookies Data (in respect of [CATEGORY] cookies), Device Data, Content Data, Transaction Data, Connected Data, Usage Data, Location Data, and the preferences we have inferred you have and use to personalise the App and Services, being [[INSERT] **OR** the preferences noted in your account at [LOCATION]].]

- **Competition Data:** information about the competitions you enter with us, being your competition history, the applicable terms and conditions, associated third parties and any additional privacy notices.