

# PRIVACY POLICY - SKYDD

## Who We Are

SKYDD offers digital distribution of health insurance products powered by SKYDD INSURANCE BROKERS LIMITED with its registered address at 20, Marina Road Lagos (“SKYDD”/” We”). This policy is to inform you of how we collect, use and store personal information provided by you when you visit our website (<https://skydd.ng/>) or use the SKYDD mobile application and the associated services at any time (the “Service”). We use your data to provide and improve your experience on the SKYDD website and application. By using the Service, you agree to the collection and use of personal information in accordance with this policy. If you have any questions about your personal information, please email us at [hello@skydd.ng](mailto:hello@skydd.ng) or leave a post on our community forum. By continuing to use the Platform, you accept and consent to the provisions described in this Policy.

## The information we hold about you

**Information submitted through our app or website:** Personal data, or personal information means any information provided by you with which you can be identified. When you sign up to the app and provide details such as your name, ID (passport data page, national ID, driver’s license), biometric data/BVN, your photograph, house address, email address, phone number, voice recordings (when you call our helpline) and other details which would enhance your service experience.

**Details about your transactions with us:** This includes your product purchase history, information you provide to deliver payment for services, frequent transactions etc.

**Information on how you use your device:** We may also collect information that your browser sends whenever you visit our Service or when you access the website by or through a computer ('Usage Data'). This Usage Data may include information such as your computer's Internet Protocol address (e.g. IP address), browser type, browser version, the pages of our Service that you visit, the time and date of your visit, the time spent on those pages, unique device identifiers and other diagnostic data.

**When you access the Service by or through a mobile device or use the mobile app:** This Usage Data may include information such as the type of mobile device you use, your mobile device unique ID, the IP address of your mobile device, your mobile operating system, the type of mobile Internet browser you use, unique device identifiers and other diagnostic data. We only have access to information you choose to share with us. This information may include access to your phonebook, current location, camera or photos. We do not store or upload your information to our servers, we only collect what we need to improve your experience.

**Other information:** We may also process specific categories of information for specific and limited purposes, such as detecting and preventing financial crime or making our services available

to customers. We will only treat particular types of information where we have obtained your explicit consent or are otherwise lawfully permitted to do so.

**Sensitive data:** We may hold information about you which includes without limitation to health, criminal conviction information or biometric information used to uniquely identify you. We will only hold this data when we need to; for the purposes of the product and services we are providing to you, or where we are required to process your data for a public interest purpose, or where we have a legal obligation or your consent to do so.

**Information which you have consented to us using:** We may collect information about your marketing preferences to help us share with you information about relevant services, products and offers that we think may be of interest to you.

## **How we use your personal Information**

To the extent permissible under applicable law, we may use your information for the following legitimate actions:

- Determine your eligibility for our products and services.
- Verify your identity when you access your account information.
- Administer your accounts or other products and services that we or our partners/affiliates may provide to you.
- Respond to your requests and communicate with you.
- Prevention of crime, fraud, money laundering or terrorism financing activities
- Managing our risks
- Personalize your experience, improve our website and personal services, enhance our marketing and communication strategy.
- Product design feedback and analysis, For other business research, analytics and monitoring with your permission. We use your information: To check your account balance, transaction history and predict your billings.
- To market and communicate our products and services and those of affiliated partners with you via email. This would be determined by what we think would interest you and if you are not interested, you can always unsubscribe.
- Notify you about changes to our Services.
- Allowing you to participate in interactive features of our Services when you choose to do so
- Provide customer care and support and for internal operations, including troubleshooting, data analysis, testing, security and account management.
- Monitor our conversation with you when we speak on the telephone (for example, to check your instructions to us, to analyze, to assess and improve customer service; for training and quality assurance purposes; for verification, fraud analysis and prevention purposes
- Comply with and enforcing applicable legal and regulatory requirements, relevant industry standards, contractual obligations and our policies.
- Provide you with tailored content and marketing messages such as recommending other products or services we believe you may be interested in
- For other purposes required by law or regulation

## **How do we share your Personal Information?**

We may share your personal information with:

- Our affiliates, related or sister entities and/or subsidiaries we control, but only for purposes allowed by this document and under the law.
- Law enforcement, government officials, or other third parties if we are compelled to do so by a subpoena, court order or similar legal procedure, when it is necessary to do so to comply with law, or where the disclosure of personal information is reasonably necessary to prevent physical harm or financial loss, to report suspected illegal activity, or to investigate violations of a User of the Platform;
- Third party service providers who assist us in providing the services on the Platform to you, whether payment service or otherwise.
- deliver targeted advertising, marketing (which may include in-product messaging) or information to you which may be useful to you, based on your use of our application and website;

We may also disclose your Personal Information in the good faith and belief that such action is necessary in any of the following circumstances:

- We have your consent to share the information.
- To comply with a legal obligation.
- To bring you improved service across our array of products and services, when permissible under relevant laws and regulations, by disclosing your personal information with the Bank's affiliated websites and businesses.
- To protect and defend the rights or properties of the Bank.
- To prevent or investigate possible wrongdoing in connection with the Service.
- To protect the personal safety of users of our Service or the public.
- To protect us against legal liability.

## **How we secure your Information**

We have implemented appropriate organizational and technical measures to keep your personal information/data, confidential and secure. This includes the use of encryption, access controls and other forms of security to ensure that your data is protected. We require all parties including our staff and third-parties processing data on our behalf to comply with relevant policies and guidelines. Where you have a password which grants you access to specific areas on our site or to any of our services, you are responsible for keeping this password confidential. We request that you do not share your password or other authentication details (e.g. token generated codes, PIN or Passwords) with anyone.

Although we have taken measures to secure and keep your information confidential, because the security of your data is important to us, please be aware that no method of transmission over the Internet, or method of electronic storage can always guarantee 100% security. While we strive to

use commercially acceptable means to protect your personal data, we cannot guarantee its absolute security, you are responsible for securing and maintaining the privacy of your password and account/profile registration information and verifying that your personal information with us is valid, accurate and up to date. If we receive instructions using your account login information, we will consider that you have authorized the instructions and we will process the instruction accordingly, and without incurring any liability for doing so.

## **How long do we keep your information.**

We retain your Information for as long as the purpose for which the information was collected continues. The information is then securely destroyed unless its retention is required to satisfy legal, regulatory, internal compliance or accounting requirements or to protect SKYDD's interest.

Please note that regulations may require SKYDD to retain your personal data for a specified period even after the end of your banking relationship with us.

## **Information from locations outside Nigeria**

If you are located outside Nigeria and choose to provide information to us, please note that the data, including personal data, will be processed in Nigeria. Your consent to this Privacy Policy followed by your submission of such information represents your agreement to that transfer.

## **Accuracy and update of your Information**

You are responsible for making sure the information provided to the Bank is accurate and should inform the Bank on any changes as it occurs, this will enable us to update your information with us.

Any changes will affect only future uses of your Personal Information. Subject to applicable law, which might, from time to time, oblige us to store your Personal Information for a certain period, we will respect your wishes to correct inaccurate information. Otherwise, we will hold your Personal Information for as long as we believe it will help us achieve our objectives as detailed in this Privacy Policy.

## **Your Rights**

- You have certain rights in relation to the personal data we collect as provided by the Nigeria Data Protection Act 2023, these rights include:
- A right to access your personal data.
- A right to rectify/update your information in our possession.
- A right to request the erasure of personal data.
- A right to withdraw your consent to processing of personal data. This will however not affect the legality of processing carried out prior to any such withdrawal.
- Right to object to processing of personal data. This will only be applicable where there are no legal or operational reasons.

- Request that your personal data be made available to you in a common electronic format and/or request that such data be sent to a third party.
- Request that your information be erased. We might continue to retain such data if there are valid legal, regulatory or operational reasons.

These rights are however subject to certain limitations as provided under the Nigeria's Data protection laws.

## **Privacy of minors**

We do not knowingly collect names, email addresses, or any other personally identifiable information from children. Our Platform and service thereon are only available to persons who are 18 years old and above, or persons who have attained the age of majority in their respective jurisdictions. If you are a parent or guardian and you are aware that your child has provided us with personal data without our knowledge and without the requisite parental consent, please promptly contact us.

## **Social Media Platforms**

We operate and communicate through our designated pages and accounts on some social media platforms to communicate and engage with our customers. We monitor and record comments and posts made about us or the Platform on these channels so that we can improve the Service. The general public can access and read any information posted on these sites. Please note that any content you post to such social media platforms is subject to the applicable social media platform's terms of use and privacy policies. We recommend that you review the information carefully in order to better understand your rights and obligations regarding such content.

The Service may also allow you to connect with us on, share on, and use third-party websites, applications, and services. Please be mindful of your personal privacy needs and the privacy needs of others, as you choose whom to connect with and what to share and make public. We cannot control the privacy or security of information you choose to make public or share with others. We also do not control the privacy practices of third parties. Please contact those sites and services directly if you want to learn about their privacy practices.

## **Third Party Websites**

Our Platform may have links to or from other websites that are not operated by us. We have no control over and assume no responsibility for the security, privacy practices or content of third-party websites or services. We recommend that you always read the privacy and security statements on these websites.

## **Service Providers**

We may employ third party companies and individuals to facilitate the Service ("Service Providers"), on our behalf, to perform specific Service-related roles or to assist us in analyzing how the Service is used. These third parties have access to your Personal Data only to perform these tasks on our behalf and are obligated not to disclose or use it for any other purpose outside of the service-specific need for which the data is required.

## **Changes to this Policy**

This Privacy Policy is effective as of the date stated above and will remain in effect except with respect to any changes in its provisions in the future, which will be in effect immediately after being posted on our website. Based on the changing nature of privacy laws, user needs and our business, we may modify this Privacy Policy from time to time.

We encourage periodic reviews of this Privacy Policy for awareness of any changes that may have occurred. Your continued use of the Services after we post any modifications to the Privacy Policy on our website will constitute your acknowledgment of the modifications and your consent to abide and be bound by the modified Privacy Policy.

## **OUR COOKIE POLICY**

Our website uses cookies to give you an enhanced user experience on our website and to personalize content tailored to your needs. Our website uses cookies to distinguish you from other users of the site. By continuing to browse the site, you are agreeing to our use of cookies.

### **What are Cookies?**

Cookies are small files that stored on your computer's hard drive and which records your navigation of a website (if you permit) so that, when you revisit that website, it can present tailored options based on the information stored about your last visit. Cookies can be used to analyze traffic and for advertising and marketing purposes.

### **Changing your cookie preferences**

If you want to check or change what types of cookies you accept, this can be done within your browser settings.

### **What are the cookies we use?**

- **Strictly necessary cookies.** These are cookies that are required for the operation of our website. They include, for example, cookies that tracks your current page/activity on the SKYDD website.
- **Analytical cookies.** These cookies allow us to recognize and count the number of visitors to our website and to see how visitors move around our website when they are using it. This helps us to improve the website performance and ensure that users of are able to easily navigate the website and access information and content seamlessly.
- **Functionality cookies.** We use these cookies to recognize you when you return to our website. This enables us to personalize our content to suite you. your needs, lifestyle etc.
- **Targeting cookies.** These cookies record your visit to our website, the pages you have visited and the links you have followed. We will use this information to make our website and the advertising displayed on it more relevant to your interests. We may also share this information with third parties for this purpose.

- **Session cookies:** These are only stored on your computer during your web session and are automatically deleted when you close your browser. These cookies usually store an anonymous session ID allowing you to browse a website without having to log in to each page. Note that they do not collect any information from your computer.

## **How long do cookies last?**

Some cookies are removed from your computer when you finish your session and exit the browser, for example, sessions cookies. Others stay for longer, sometimes indefinite, and are saved onto your device so they are there when you return to the website, e.g, Analytical Cookies.

## **Is it possible to reject Cookies?**

Yes. You can choose to have your computer warn you each time a cookie is being sent, or you can choose to turn off all cookies if you don't want to receive cookies that are not strictly necessary to the functionality of, or features on our website. Check the "Help" menu of your browser to learn how to change your cookie preferences.

Note however that if you disable cookies, some of the features that make our website more efficient, may not function properly on your device.

## **Managing Cookie Preferences**

Also, when you visit our website for the first time, we will show you a pop-up with an explanation about cookies. As soon as you click on "Save preferences", you consent to us using the categories of cookies and plug-ins you selected in the pop-up, as described in this Cookie Policy. You can always withdraw the consent you have previously given to us. When we receive privacy signal from your browser, we will set your privacy settings on this website to strictly necessary.

## **Third party cookies**

We may work with service providers who help us to provide you with a better, faster, and safer experience. These third parties are authorized to place third-party cookies on our sites or in our services, applications, and tools with our permission.

With the exception of the use of such cookie technologies by our service providers or other authorized third-parties, we do not permit third-parties on our website to include or utilize any cookies, web beacons, local storage, or similar technologies for tracking purposes or to collect your personal information.

## **Contact Us**

We are committed to resolving your privacy complaints and concerns as quickly as possible and have procedures in place to help resolve any problems or complaints efficiently. If you have any questions about this Privacy Policy, please contact us at [hello@skydd.ng](mailto:hello@skydd.ng) or call +2349130287658.