This privacy notice has been compiled to better serve those who are concerned with how their 'Personally Identifiable Information' (PII) is being used online. PII, as described in Global privacy law and information security, is information that can be used on its own or with other information to identify, contact, or locate a single person, or to identify an individual in context. Please read our privacy policy carefully to get a clear understanding of how we collect, use, protect or otherwise handle your Personally Identifiable Information.

# What business information do we collect from the people that visit our website or webapp for a vehicle insurance quote?

When using Trulaju, you are required to enter accurate information about your full name, email address, mobile number, vehicle details and other relevant information you provide us and to help us provide the best and accurate quote.

#### When do we collect information?

We collect information from you when you register on Trulaju web portal.

#### How do we use your information?

We use the information we collect from you when you register, sign up for our services or respond to best quality service in the following ways:

#### To be efficient, effective and economical.

To allow us to better serve you in responding to your customer service requests.

#### Marketing.

We use personal data to market our services to our users. This includes sending users communications about our services, features, promotions, sweepstakes, studies, surveys, news, updates, and events. We may do so through various methods, including email, text messages, push notifications, in app communications.

### How do we protect your information?

Your personal information is contained behind secured networks and is only accessible by an authorised number of persons who have special access rights to such systems, and are required to keep the information confidential. In addition, all sensitive/credit information you supply is encrypted via Hypertext Transfer Protocol Secure (HTTPS) technology.

We implement a variety of security measures when a user enters, submits, or accesses their information to maintain the safety of your personal information. All sensitive data is securely isolated from other areas of our systems to keep your data safe.

#### **Telematics data**

We use telematics data to determine accurately when you're driving, to work out your pricing, and to help with any disputes or claims payout.

#### Quote, pricing and claims data

We may collect data on quotes, pricing and claims. This can help to improve our pricing, our processes and those of the relevant insurer, to help with risk modelling, and to help with the detection and prevention of fraud.

Your personal data belongs to you. Any quote, pricing or claims data that isn't your personal data belongs to us. In some cases, we'll anonymise information so that it can no longer be used to identify you.

#### Right to delete

If you'd like us to delete your information, just let us know. Again, the best way to do that is usually via Trulaju webapp portal.

Bear in mind that if you've bought a policy with us, we may not be able to delete your account when you ask. We need to keep your data for at least seven years from when your most recent policy expired. That's in case of any future claims against you, any disputes, or anything else meaning we need to show records of your cover.

There may be other reasons why we won't be able to delete your account where you haven't bought a policy; for example any disputes, or for the detection and prevention of fraud.

In other case and wherever we can, we'll delete your account upon your request. This will mean that all of your data is removed from our live systems. Your data will still exist in our archive. But we will have marked your records so that they appear to have never existed.

#### Right to refuse

You have the right to refuse to process your data in certain circumstances. For example, you have the right to stop your data being used for direct marketing. We don't send many marketing emails. But if you've opted in to our updates and changed your mind - you can unsubscribe at any time.

#### Right to transfer

You have a right to get a copy of the personal data we hold about you. We'll provide your data in a standard portable format. If you have any trouble understanding the data, let us know and we'll help. The best way to ask is usually via Trulaju webapp potrtal.

We won't usually charge a fee for providing that information, but we may do in certain circumstances. For example, if you make repetitive requests for information, we may charge a small fee or refuse your request.

#### Right to correct

You can login to Trulajy webapp portal to correct any inaccuracies in parts of your account. Some information can only be updated by our support team - so please speak to us if you'd like any help. Changing information on your account could impact your pricing, and it could mean that we're no longer able to offer you one or more of our products.

#### Right to restriction

You have a right to restrict the processing of your personal data in certain circumstances. This means you can limit the way we use your data.

This is an alternative to requesting the erasure of your data. For example, we could securely and temporarily store your data in another system if you contest its accuracy and we need to verify it.

#### Do we use 'cookies'?

Yes. Cookies are small files that a site or its service provider transfers to your computer's hard drive through your Web browser (if you allow) that enables the site's or service provider's systems to recognize your browser and capture and remember certain information. They are also used to help us understand your preferences based on previous or current site activity, which enables us to provide you with improved services. We also use cookies to help us compile aggregate data about site traffic and site interaction so that we can offer better site experiences and tools in the future.

## We use cookies to:

- Understand and save user's preferences for future visits.
- Compile aggregate data about site traffic and site interactions in order to offer better site experiences and tools
  in the future. We may also use trusted third-party services that track this information on our behalf.

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. You do this through your browser settings. Since each browser is a little different, look at your browser's Help Menu to learn the correct way to modify your cookie management.

If you turn cookies off, some features will be disabled but you will still be able to use our service.

#### Third-party disclosure

We do not sell, trade, or otherwise transfer to outside parties your personal Information unless we provide users with advance notice. This does not include website hosting partners and other parties who assist us in operating our website, conducting our business, or serving our users, so long as those parties agree to keep this information confidential. We may also release information when its release is appropriate to comply with the law, enforce our site policies, or protect ours or others' rights, property or safety.

#### Third-party links

We do not include or offer third-party products or services on our website.

#### Use social network login

We use social network login as a two factor authentication.

#### **Data Protection Regulation**

The terms "website privacy" and "website data protection" are commonly used to refer to the web of Nigeria data protection laws and regulations which apply to the collection and use of personal data via websites. These include the Privacy Regulations (full name: Nigeria Data Protection regulation (NDPR) Regulations 2019.

#### According to Data Protection Regulation, we agree to the following:

Users can visit our site anonymously.

Once this privacy notice is created, we will add a link to it on our home page or as a minimum, on the first significant page after entering our website. Ensuring that the organisation adheres to the stated policies. Ensuring continued adherence to data protection and privacy policies and procedures. Ensuring that individual data is protected. Providing for effective oversight of the collection and use of individual information. Being responsible for effective data protection and management within that organisation; and ensuring compliance with the privacy and data security policies. Training and education for employees to promote awareness of and compliance with the privacy and data security policies. Developing recommended practices and procedures to ensure compliance with the privacy and data security policies.

Our Privacy Notice link includes the word 'Privacy' and can easily be found on the page specified below.

You will be notified of any Privacy Notice changes:

• On our Privacy Notice Page

Can change your personal information:

By logging in to your account

#### How does our site handle Do Not Track signals?

We honour Do Not Track signals and Do Not Track, plant cookies, or use advertising when a Do Not Track (DNT) browser mechanism is in place.

## Does our site allow third-party behavioural tracking?

It's also important to note that we do not allow third-party behavioural tracking

## **Data Protection Regulation**

The Data Protection Regulation is a law that sets the rules for commercial email, establishes requirements for commercial messages, gives recipients the right to have emails stopped from being sent to them, and spells out tough penalties for violations.

## We collect your email address in order to:

Send information, respond to inquiries, and/or other requests or questions

# To be in accordance with Data Protection Regulation, we agree that information must:

- Used fairly and lawfully.
- Handled according to people's data protection rights.
- Use in a way that is adequate, relevant, and not excessive.
- Protect every user's information provided to us.
- Kept for no longer than is absolutely necessary.

#### If at any time you would like to unsubscribe from receiving future emails, you can email us at

• Follow the instructions at the bottom of each email.

and we will promptly remove you from ALL correspondence.

#### **Contacting Us**

If there are any questions regarding this privacy policy, you may contact us using the information below.

Trulaju Limited
Office 2A, Johnson Street,
Obafemi Awolowo Way, Ikeja,
Lagos
Nigeria
hello@trulaju.com

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# **COOKIE POLICY (websites)**

#### Do we use 'cookies'?

Yes.

#### What are cookies?

Cookies are small files that a site or its service provider transfers to your computer's hard drive through your Web browser (if you allow) that enables the site's or service provider's systems to recognize your browser and capture and remember certain information. For instance, we use cookies to help us remember and process the items in your shopping cart. They are also used to help us understand your preferences based on previous or current site activity, which enables us to provide you with improved services. We also use cookies to help us compile aggregate data about site traffic and site interaction so that we can offer better site experiences and tools in the future.

#### We use cookies to:

- Understand and save user's preferences for future visits.
- Compile aggregate data about site traffic and site interactions in order to offer better site experiences and tools in the future. We may also use trusted third-party services that track this information on our behalf.

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. You do this through your browser settings. Since each browser is a little different, look at your browser's Help Menu to learn the correct way to modify your cookie management.

If you turn cookies off, some features will be disabled. This might affect your user's experience and/or the site may not function fully.

However, you will still be able to use our service.