

PRUDENTIAL LIFE ASSURANCE COMPANY

PRIVACY NOTICE

DOCUMENT INFORMATION

Last updated: April 01, 2020

Version: 1.0

INTRODUCTION

This Privacy Policy describes our policies and procedures on the collection, use and disclosure of Your information when you access our sites and tells you about your privacy rights and how the law protects you.

When you visit our website and use our services, you trust us with your personal information. In this privacy notice, we describe our privacy policy.

Our privacy policy describes what information we collect, how we use it and what rights you have in relation to it. Please read through it carefully and if there are any provisions in this privacy policy that you disagree with please discontinue use of our site and/or our services.

This privacy policy applies to all information collected through our websites and/or any related services, sales, marketing or events.

By using the site/service, you agree to the collection and use of information in accordance with this Privacy Policy.

DEFINITIONS

We/Us means Prudential Life Assurance Company and its affiliates

Prudential Group means any affiliates of Prudential Life Assurance Kenya (including, Prudential Plc, Prudential Africa Holdings Limited and Prudential Corporation Asia).

Service Provider means any natural or legal person who processes the data on behalf of the Company. It refers to third-party companies or individuals employed by the Company to facilitate the Service, to provide the Service on behalf of the Company, to perform services related to the Service or to assist the Company in analyzing how the Service is used. It includes accountants, auditors, IT service and platform providers, intermediaries, reinsurers, investment managers, agents, selected third party financial and insurance product providers and our professional advisers.

Third-party Social Media Service refers to any website or any social network website through which a User may log in or create an account to use the site/service

Personal Data is any information that relates to an identified or identifiable individual.

Cookies are small files that are placed on your computer, mobile device or any other device by a website, containing the details of your browsing history on that website among its many uses.

Usage Data refers to data collected automatically, either generated using the site/service or from the Service infrastructure itself (for example, the duration of a page visit).

COLLECTING AND USING YOUR PERSONAL DATA

While using our Service, we may ask you to provide us with certain personally identifiable information that can be used to contact or identify you. This information may include, but is not limited to: Email address, First name and last name, Phone number, Address, Postal code, City, Country, Photograph etc.

All personal information that you provide to us must be true, complete and accurate, and you must notify us of any changes to such personal information.

INFORMATION AUTOMATICALLY COLLECTED

Usage Data is collected automatically when using the site/service. Usage Data may include information such as your Device'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, We may collect certain information automatically, including, but not limited to, 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 may also collect information that your browser sends whenever you visit our Service or when you access the Service by or through a mobile device.

INFORMATION COLLECTED FROM OTHER SOURCES

We may obtain information about you from other sources, such as public databases; joint marketing partners, social media platforms (such as Facebook), as well as from other third parties.

Examples of the information we receive from other sources include: social media profile information (your name, gender, birthday, email, current city, state and country, user identification numbers for your contacts, profile picture URL and any other information that you choose to make public); marketing leads and search results and links, including paid listings (such as sponsored links)

COOKIES AND TRACKING TECHNOLOGIES

We use cookies and similar tracking technologies to track the activity on our site/service and store certain information.

You can instruct your browser to refuse all cookies or to indicate when a cookie is being sent. However, if you do not accept cookies, you may not be able to use some parts of our site/service.

These Cookies are essential to provide you with services available through the Website and to enable you to use some of its features. They help to authenticate users and prevent fraudulent use of user accounts.

These Cookies allow us to remember choices you make when you use the Website, such as remembering your login details or language preference. The purpose of these Cookies is to provide you with a more personal experience and to avoid you having to re-enter your preferences every time You use our site.

USE OF YOUR PERSONAL DATA

We will use the personal information for the following purposes: to communicate with you, to enable us to administer, process and service our products and services for you, to comply with legal or regulatory requirements, to improve our products and services, to send you marketing and promotional material, to request feedback, to carry out checks using third party agencies or publicly available information and keeping your information on record as well as carrying out other internal business purposes. For certain products or services, we'll need to process your sensitive personal information, such as information relating to health.

If appropriate, we may also pass on your personal information to financial crime prevention agencies and any legal, regulatory or government bodies. We may share your data with third party vendors, service providers, contractors or agents who perform services for us or on our behalf and require access to such information perform their services. We will not share, any of your information with third parties for their promotional purposes or any without your consent.

Your information, including Personal Data, is processed at our operating offices and in any other places where the parties involved in the processing are located. This information may be transferred to other jurisdiction where the data protection laws may differ than those from those is Kenya. As we, the Prudential Group, and some of our Business Partners are global companies, we might need to send your personal information overseas. Any transfer of personal data overseas will be in accordance with applicable local law requirements.

Your consent to this Privacy Policy followed by your submission of such information represents your agreement to that transfer.

The Company will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Policy and no transfer of your Personal Data will take place to an organization or a country unless there are adequate controls in place including the security of your data and other personal information

When you share personal information (e.g. by posting comments, contributions or other content to the sites) or otherwise interact with public areas of the Site such personal information may be viewed by all users and may be publicly distributed outside the Site

If you interact with other users of our Sites and register through a social network your contacts on the social network will see your name, profile photo, and descriptions of your activity. Similarly, other users will be able to view descriptions of your activity, communicate with you within our Sites, and view your profile

MANAGEMENT OF USAGE DATA

The Company may use Usage Data for the following purposes:

- To provide and maintain our site/service including to monitor its usage.
- To manage your registration as a user of the Service. The Personal Data you provide can give you access to different functionalities of the Service that are available to you as a registered user
- To contact You by email, telephone calls, SMS, or other equivalent forms of electronic communication, such as a mobile application's push notifications regarding updates or informative communications related to the functionalities, products or contracted services, including the security updates, when necessary or reasonable for their implementation.
- To provide you with news, special offers and general information about other services and events which we offer that are similar to those that you have already purchased or enquired about unless You have opted not to receive such information
- To attend to and manage Your requests to Us
- To contact you by email, telephone calls, SMS, or other equivalent forms of electronic communication, such as a mobile application's push notifications regarding updates or informative communications related to the functionalities, products or contracted services, including the security updates, when necessary or reasonable for their implementation.

We may share your personal information with Service Providers to monitor and analyze the use of our Service, to show advertisements to you to help support and maintain our Service, to contact you, to advertise on third party websites to you after you visited our Service or for payment processing.

RETENTION OF YOUR PERSONAL DATA

We will retain your Personal Data only for as long as is necessary for the purposes set out in this Privacy Policy. We will retain and use your Personal Data to the extent necessary to comply with our legal obligations as per the Data Protection Act, resolve disputes, and enforce our legal agreements and internal policies. All your information will be kept in line with our data retention policy.

We will also retain Usage Data for internal analysis purposes. Usage Data is generally retained for a shorter period, except when this data is used to strengthen the security or to improve the functionality of Our Service, or we are legally obligated to retain this data for longer time periods.

When we have no ongoing legitimate business need to process your personal information, we will either delete or anonymize it, or, if this is not possible we will securely store your personal information and isolate it from any further processing until deletion is possible.

You can request: a copy of your personal information, that we correct anything that's wrong, or complete any incomplete personal information or that we delete your personal information if it is no longer needed for the purposes set out above or there is no other legal basis for the processing of your personal information.

We, Prudential Life Assurance Kenya and the Prudential Group will send you information by text, email, telephone, post or other means about our products and services.

DISCLOSURE OF YOUR PERSONAL DATA

We will disclose your personal data under the following circumstances:

- If we are involved in a merger, acquisition or asset sale, your Personal Data may be transferred. We will provide notice before your Personal Data is transferred and becomes subject to a different Privacy Policy
- Under certain circumstances, the Company may be required to disclose your Personal Data if required to do so by law or in response to valid requests by public authorities (e.g. a court or a government agency).
- We may disclose your Personal Data in the good faith belief that such action is necessary to: Comply with a legal obligation , Protect and defend the rights or property of the Company, Prevent or investigate possible wrongdoing in connection with the Service ,Protect the personal safety of Users of the Service or the public and/or Protect against legal liability

SECURITY OF YOUR PERSONAL DATA

We have taken to protect your personal information against unauthorized access or processing, of the personal data. We have implemented appropriate policies and procedures to protect all your personal information held by us.

The security of your Personal Data is important to us but no method of transmission over the Internet, or method of electronic storage is 100% secure. While we use commercially acceptable means to protect and secure your Personal Data, we cannot guarantee its absolute security. Please note to access our sites within a secure environment

CHILDREN'S PRIVACY

We do not knowingly collect personally identifiable information from children (any person under 18 years of age). If you are a parent or guardian and you are aware that your child has provided Us with Personal Data, please contact Us via info@prudentiallife.co.ke If we become aware that we have collected Personal Data from children without verification of parental consent, we take steps to remove that information from Our servers.

By using our site, you represent that you are at least 18 or that you are the parent or guardian of such a minor and consent to such minor use of the Site

LINKS TO OTHER WEBSITES

Our site may contain links to other websites that are not operated by us. If you click on a third-party link, you will be directed to that third party's site. We strongly advise you to review the Privacy Policy of every site you visit.

We have no control over and assume no responsibility for the content, privacy policies or practices of any third-party sites or services.

CHANGES TO THIS PRIVACY POLICY

We may update our Privacy Policy from time to time. We will notify you of any changes by posting the new Privacy Policy on our website

If we make a material change to the policy, we will let you know via notice on Our website, prior to the change becoming effective and update the "Last updated" date at the top of this Privacy Policy.

You are advised to review this Privacy Policy periodically for any changes. Changes to this Privacy Policy are effective when they are posted on this page.

CONTACT US

If you have any questions /comments about this Privacy Policy, you can contact us via email info@prudentiallife.co.ke or by post on

Prudential Life Assurance Kenya

P.O Box 25363-00100, Nairobi, Kenya