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Pensions

Data Privacy Policy

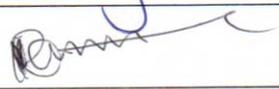


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1. Approval Page

| Author | Date | Version | Reference |
|-------------------------------|----------------|---------|---------------------|
| Data Protection Officer (DPO) | April 15, 2025 | 1.0 | Data Privacy Policy |

2. Document Review and Approval

| Name | Signature |
|---|---|
| Mr. William Eboigbe – Data Protection Officer |  |
| Mrs. Bolanle Onotu – Managing Director/CEO |  |
| | |

3. Revision History

| Version | Revision date | Revised by | Summary of changes |
|---------|---------------|------------|--------------------|
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1. About this Policy

This policy explains when and why NPL collects personal information about visitors to our website, how the information is used, how we keep it secure, and your rights in relation to it. We may update this policy from time to time due to regulatory changes. Significant changes will be communicated, but you are advised to check the website for the latest version.

NPL complies with the Nigeria Data Protection Act 2023 (NDPA) and acts as the "Data Controller" of personal data collected. Consent to our use of cookies when you first visit our website allows us to use them on subsequent visits.

2. Who We Are

We are **Norrenberger Pensions Limited**, a duly licensed Pension Fund Administrator (PFA), with its registered address at 22, Otukpo Street, Off Gimbiya Street, Area 11, Garki, Abuja, Nigeria.

3. Collecting Personal Information

NPL may collect, store, and use the following types of information:

- Computer and device details (IP address, location, browser type, OS).
- Website usage details (referral source, visit length, page views, navigation paths).
- Information you provide when registering, creating a profile, subscribing to emails, or using website services.
- Information submitted for inquiries, complaints, or transactions (e.g., name, email, address, phone number, payment details).
- Content you post for publication (username, posts, profile pictures).
- Communications sent via email or through the website.

If you disclose another person's personal information, you must obtain their consent.

4. Using Personal Information

NPL uses your information for:

- Administering and personalizing our website.
- Enabling use of available services.



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- Processing retirement savings account (RSA) withdrawal applications.
- Updating your profile in our database.
- Sending statements, invoices, reminders, and payment collection.
- Sending non-marketing communications, notifications, or newsletters.
- Sending marketing communications (only with your consent).
- Providing third parties with non-identifiable statistical data.
- Handling inquiries, complaints, and feedback.
- Ensuring website security, fraud prevention, and compliance monitoring.

NPL will not share your personal data with third parties for their direct marketing without your consent.

5. Disclosing Personal Information

NPL ensures the confidentiality of data received in the course of its business and will not disclose save for the following:

- As required by law or legal proceedings.
- To establish or defend legal rights.
- During business or asset transfers.
- To competent authorities if ordered.

6. International Data Transfers

Information may be transferred, processed, or stored in other countries where NPL may be required to do so by law.

7. Retaining Personal Information

NPL retains personal data only as long as necessary based on regulations and other relevant legislations. Exceptions include:

- Legal requirements.
- Ongoing or prospective legal proceedings.
- Establishing, exercising, or defending legal rights.

8. Securing Your Information

NPL takes technical and organizational measures to protect personal data, including encryption of financial transactions and password-protected servers. However, internet transmissions are inherently insecure.

9. Amendments

This policy may be updated once every two years or as the need arises, to bring it up to date with emerging legislation.

10. Third-Party Websites

The Norrenberger Pensions website contains links to external sites. NPL is not responsible for third party privacy practices.

11. Updating Information

You may notify us to correct or update your personal information.

12. Cookies

NPL uses cookies (persistent and session) to enhance usability, track usage, prevent fraud, and personalize services.

You can block or delete cookies via browser settings, but this may affect website functionality.

13. Your Rights

You have the right to:

- Access the personal data we hold about you.
- Be informed about how your data is processed.
- Correct or erase your data in certain circumstances.
- Restrict or object to processing.
- Transfer your data to another party.



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Requests require identity verification (e.g., passport, driver's license, national ID plus utility bill).

You may opt out of marketing communications at any time.

14. Contact

For questions, comments, or requests regarding data processing, contact our **Data Protection Officer (DPO)** at:

dpo@norrenpensions.com