

I'M ALIVE PRIVACY POLICY

1.0 OVERVIEW

This Privacy Policy indicates that we are dedicated to and responsible for processing the information of our customers, stakeholders, employees, and other interested parties with absolute caution and confidentiality.

This policy describes how and why we collect, store, handle and secure our data fairly, transparently, and with confidentiality. The purpose of the data collection is as stated in section 5.0c of this policy.

This policy ensures that I'm Alive follows good practices to protect the data gathered from its customers.

I'm Alive shall collect and process personal data in accordance with a specific, legitimate and lawful purpose consented to by the Data Subject.

I'm Alive shall make known the purpose of collection of data to the Data Subject and will ensure not to obtain information by fraud, coercion, or undue influence.

I'm Alive shall not share Personal Data informally or disclosed to unauthorized people, within the company or externally.

I'm Alive shall not violate the rights of the data subject but ensure to protect the fundamental rights of the data subject and other rights under the Nigerian laws.

Transfer of information of the data subject shall be in accordance with the Nigeria Data Protection Regulation (NDPR).

To emphasize the need for transparency over the usage of personal data, I'm Alive ensures fair processing of information typically through this privacy policy.

Personal data is defined as "Any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person".

Data subject is defined as "Data Subject means an identifiable person; one who can be identified directly or indirectly, in particular by reference to an identification number or to one or more factors specific to his physical, physiological, mental, economic, cultural or social identity"

2.0 RIGHTS OF THE DATA SUBJECT

- a. A data subject has the right to be informed of the processing of personal data in a concise, transparent and accessible form with appropriate safeguards for data protection. The data subject is responsible for making sure the information provided to I'm Alive is accurate, and should inform the I'm Alive of any changes as it occurs to enable I'm Alive update the personal information.
- b. The data subject has the right to lodge a complaint with respect to the processing of his/her personal data.
- c. Data subject has the right to access information I'm Alive holds, access their personal data and other supplementary information and obtain information about how the data is processed.
- d. Data subject has the right to object to or restrict processing by blocking or withdrawing consent to processing information. When processing is restricted, I'm Alive may store the personal data, but not further process it.
- e. Data subject has the right to have inaccurate or incomplete personal data rectified. If this personal data in question has been disclosed to third parties, they must be informed of the rectification where possible. I'm Alive must also inform the data subject about the third parties to whom the data has been disclosed where appropriate.
- f. Data subject has the right to request the deletion or removal of personal data where there is no compelling legal or regulatory requirement for its continued processing. I'm Alive will make sure that this right is protected.
- g. **I'm Alive** will ensure that personal data is moved, copied, or transferred easily from one IT environment to another in a safe and secure way, without hindrance to usability.

3.0 HOW DO WE SHARE PERSONAL DATA WITH A THIRD PARTY?

- a. I'm Alive in efforts to provide excellent products and services may need to outsource its product delivery, this will be done in line with relevant regulations and law.
- b. I'm Alive may share the personal information of the data subject with a third party by executing a third-party processing contract in order to provide the quality of services requested by the data subject. I'm Alive shall ensure that the third party provides the same or equal protection of user data as stated in this privacy policy
- c. I'm Alive may also share personal data where there is a public or legal duty to do so, when it is needed to conclude regulatory reporting and when I'm Alive has requested and received the permission of the data subject to share it.

4.0 HOW WE RETAIN AND DELETE PERSONAL DATA

- a. I'm Alive shall retain data collected only for the period in which the contract with a participating organization is valid. The data shall be deleted upon the expiration of the contract with a participating organization.
- b. As stated in 4.0b above, a data subject has the right to request the deletion or removal of personal data. This can be done by contacting his/her employer who would then convey the information to Chamsmobile Limited via email (iamalive@chamsmobile.com) and the record shall be deleted accordingly.

I'm Alive shall ensure that the rights of the data subject shall be in conformity with constitutionally guaranteed principles of law for the general protection and enforcement of fundamental rights.

This Privacy Policy will be subject to review and updated from time to time as deemed necessary by the Board and also in line with the NDPR as it may be reviewed from time to time.

5.0 QUESTIONS AND ANSWERS

a.	WHAT CONSTITUTES THE DATA SUBJECT'S CONSENT?	Consent is given when a data subject indicates or agrees through a statement or by clear affirmative action, to the processing of personal data relating to him or her. I'm Alive will only use the information of the data subject when the consent has been provided or when the Company is required to do so by law.
b.	WHAT PERSONAL INFORMATION DO WE COLLECT?	The following information shall be collected from the data subject: <ul style="list-style-type: none"> • Retiree number • Retiree's selfie picture • Bank verification number (BVN)
c.	WHY DO WE COLLECT PERSONAL INFORMATION?	<ul style="list-style-type: none"> • Personal Data is collected for the purpose of verifying the liveness and genuineness of Retirees. • Retiree number is collected to verify that a data subject belongs to a participating organization • Retiree's selfie picture is collected to ensure that the data subject is alive and to match the picture with the image from the BVN database. • BVN is collected to ensure that the data subject is not being impersonated. This is done by comparing the selfie picture with the image associated with the BVN. • I'm Alive is committed to ensuring that the information collected and used is appropriate for the purpose and does not constitute an invasion of your privacy.

d	HOW DO WE COLLECT PERSONAL INFORMATION?	<ul style="list-style-type: none"> • A Retiree’s selfie picture is collected using the camera on the Retiree’s mobile phone through the I’m Alive application. • Retiree Number and BVN are collected using the text input on the I’m Alive application
e.	HOW IS DATA SECURED?	<ul style="list-style-type: none"> • I’m Alive ensures the security of personal data through Chamsmobile’s dedicated cloud server with firewalls and the use of data encryption technologies. Information is secured against all foreseeable hazards and breaches such as theft, cyber-attack, viral attack, dissemination, and manipulations of any kind.

If you would like further information on anything included in this Privacy Policy, contact us at **Plot 8, Louis Solomon Street, Off Ahmadu Bello Way, Victoria Island Lagos**, iamalive@chamsmobile.com
This Privacy Notice may be updated from time to time and the most recent version can be found on iamalive.online