

# VANGUARD ASSURANCE CO. LTD.

## PRIVACY POLICY (WEB & MOBILE APPLICATION)

[VANGUARD ASSURANCE] (“we” or “us” or “our”) respects the privacy of our users (“user” or “you”). This Privacy Policy explains how we collect, use, disclose, and safeguard your information when you download our mobile application or use our web application. Please read this Privacy Policy carefully. IF YOU DO NOT AGREE WITH THE TERMS OF THIS PRIVACY POLICY, PLEASE DO NOT ACCESS THE APPLICATION.

We reserve the right to make changes to this Privacy Policy at any time and for any reason. We will alert you about any changes by updating the “Last updated” date of this Privacy Policy. You are encouraged to periodically review this Privacy Policy to stay informed of updates. You will be deemed to have been made aware of, will be subject to, and will be deemed to have accepted the changes in any revised Privacy Policy by your continued use of the Application after the date such revised Privacy Policy is posted.

This Privacy Policy does not apply to the third-party online/mobile store from which you install the Application or make payments, which may also collect and use data about you. We are not responsible for any of the data collected by any such third party.

### COLLECTION OF YOUR INFORMATION

We may collect information about you in a variety of ways. The information we may collect via the Application depends on the content and materials you use, and includes:

#### **Personal Data**

Demographic and other personally identifiable information (such as your name, phone number and email address) that you voluntarily give to us when registering with the Application. If you choose to share data about yourself via your profile, or other interactive areas of the Application, please be advised that all data you disclose in these areas is private and your data is not accessible to anyone who accesses the Application.

#### **Financial Data**

Financial information, such as data related to your payment method (e.g. valid credit card number, card brand, expiration date, mobile money number) that we may collect when you purchase, order, return, exchange, or request information about our services from the Application. [We store only very limited, if any, financial information that we collect. Otherwise, all financial information is stored by our payment processor, [Hubtel Payments], and you are encouraged to review their privacy policy and contact them directly for responses to your questions.

### **Geo-Location Information**

We may request access or permission to and track location-based information from your mobile device, either continuously or while you are using the Application, to provide location-based services. If you wish to change our access or permissions, you may do so in your device's settings.

### **Mobile Device Access**

We may request access or permission to certain features from your mobile device, including your mobile device's [camera] and other features. If you wish to change our access or permissions, you may do so in your device's settings.

### **Mobile Device Data**

Device information such as your mobile device ID number, model, and manufacturer, version of your operating system, phone number, country, location, and any other data you choose to provide.

### **Push Notifications**

We may request to send you push notifications regarding your account or the Application. If you wish to opt-out from receiving these types of communications, you may turn them off in your device's settings.

## **USE OF YOUR INFORMATION**

Having accurate information about you permits us to provide you with a smooth, efficient, and customized experience. Specifically, we may use information collected about you via the Application to:

1. Create and manage your account.
2. Deliver targeted advertising, coupons, newsletters, and other information regarding promotions and the Application to you.
3. Email you regarding your account or order.
4. Enable user-to-user communications.
5. Fulfill and manage purchases, orders, payments, and other transactions related to the Application.
6. Generate a personal profile about you to make future visits to the Application more personalized.
7. Increase the efficiency and operation of the Application.
8. Monitor and analyze usage and trends to improve your experience with the Application.
9. Notify you of updates to the Application.

10. Offer new products, services, mobile applications, and/or recommendations to you.
11. Perform other business activities as needed.
12. Prevent fraudulent transactions, monitor against theft, and protect against criminal activity.
13. Process payments and refunds.
14. Request feedback and contact you about your use of the Application.
15. Resolve disputes and troubleshoot problems.
16. Respond to product and customer service requests.

## **DISCLOSURE OF YOUR INFORMATION**

We may share information we have collected about you in certain situations. Your information may be disclosed as follows:

### **By Law or to Protect Rights**

If we believe the release of information about you is necessary to respond to legal process, to investigate or remedy potential violations of our policies, or to protect the rights, property, and safety of others, we may share your information as permitted or required by any applicable law, rule, or regulation. This includes exchanging information with other entities for fraud protection and credit risk reduction.

### **Third-Party Service Providers**

We may share your information with third parties that perform services for us or on our behalf, including payment processing, data analysis, email delivery.

### **Marketing Communications**

With your consent, or with an opportunity for you to withdraw consent, we may share your information with third parties for marketing purposes, as permitted by law.

### **Business Partners**

We may share your information with our business partners to offer you certain products, services or promotions.

## **SECURITY OF YOUR INFORMATION**

We use administrative, technical, and physical security measures to help protect your personal information. While we have taken reasonable steps to secure the personal information you provide to us, please be aware that despite our efforts, no security measures are perfect or impenetrable, and no method of data transmission can be guaranteed against any interception or other type of misuse. Any information disclosed online is vulnerable to interception and misuse by unauthorized parties. Therefore, we cannot guarantee complete security if you provide personal information.

## **OPTIONS REGARDING YOUR INFORMATION**

### **Account Information**

You may at any time review or change the information in your account or terminate your account by:

- Logging into your account settings and updating your account
- Contacting us using the contact information provided below

Upon your request to terminate your account, we will deactivate or delete your account and information from our active databases. However, some information may be retained in our files to prevent fraud, troubleshoot problems, assist with any investigations, enforce our Terms of Use and/or comply with legal requirements.]

### **Emails and Communications**

If you no longer wish to receive correspondence, emails, or other communications from us, you may opt-out by:

- Noting your preferences at the time you register your account with the Application
- Logging into your account settings and updating your preferences.
- Contacting us using the contact information provided below

If you no longer wish to receive correspondence, emails, or other communications from third parties, you are responsible for contacting the third party directly.

## **CONTACT US**

If you have questions or comments about this Privacy Policy, please contact us at:

Company Name: Vanguard Assurance Company Limited

Address: No 21 Independence Avenue

Postal Address: P.O. Box 1868

City: Accra

Phone Number: 0302 66485-7/782921-2

Fax Number: 0302:668610

Email: [vacmails@vanguardassurance.com](mailto:vacmails@vanguardassurance.com)

Website: [www.vanguardassurance.com](http://www.vanguardassurance.com)

Hotline: 233-244-334-407