LEADWAY PENSURE PFA LIMITED
DATA SUBJECT ACCESS REQUEST POLICY (DSAR)
COMPLIANCE DEPARTMENT
2025

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Contents

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Distribution

Name	Title

Approvals

Name	Position	Signature	Date
Alhaji Isa Inuwa	Chairman, Board Risk and Compliance Committee (BRCC)		
Olusegun Aganga	Chairman, Board of Directors		

The document is in line with Information Security Management Systems (ISO27001) as stated in the link below:

https://bit.ly/2ZmACdT

Introduction

This Policy sets out how Leadway Pensure PFA identifies and manages its Data Subject Access Request (**DSAR**) responsibilities in accordance with its legal and regulatory obligations. This Policy sets out the minimum standards which must be complied with by Leadway Pensure PFA Limited and only applies when Leadway Pensure PFA Limited acts as a Data Controller and not when Leadway Pensure PFA Limited acts as a Data Processor.

The purpose of this Policy is to formalize procedures for:

- Confirming the identity of any Data Subject, making a request regarding his Personal Data or the identity and legal authority of any third party making a request on a Data Subject's behalf.
- Recording and tracking Data Subjects and responses, including all correspondence and internal documents related to requests.
- Identifying and locating relevant Personal Data.
- Determining whether a Nigeria Data Protection Act (NDPA) or Nigeria Data Protection Regulation (NDPR) or any other national law exemption exists that permits or requires Leadway Pensure PFA Limited to refuse to fulfill the request.
- Handling Data Subject requests that involve several Data Subjects' Personal Data; and

- Communicating with Data Subjects at reasonable intervals regarding the status of their requests as regards their Personal Data.

Scope

This Policy applies to all Leadway Pensure PFA Limited' s employees and where appropriate, third parties working for or on behalf of Leadway Pensure PFA Limited. This Policy applies to all Personal Data relating to identifiable individuals in Leadway Pensure PFA Limited and beyond including but not limited to employees/ staff, clients, vendors and third parties.

Duties and Responsibilities

The Legal officer together with the Data Protection Officer, have the overall responsibility of ensuring that Leadway Pensure PFA Limited meets its legal and regulatory responsibilities under the NDPA and the NDPR, and to ensure compliance with this Policy.

Employees

It is the responsibility of managers to ensure that they provide sufficient and accurate data, and to ensure the information provided to the Data Subject is within the timescales agreed.

It is the responsibility of all employees to ensure they have read and understood this Policy and raise any concerns which may arise hereto.

Legal Services

This Policy is prepared and set up by the Legal Services Team, which includes the DPO. The Legal Services Team has the right to escalate any issues of non-compliance with this Policy to Management.

Data Subject Access Request (DSAR) Format

All Data Subjects seeking to exercise their rights under the NDPA must submit their requests in writing electronically via email to dpo@leadway-pensure.com

If you receive an oral DSAR, direct the Data Subject to submit the request in writing via postal mail to Leadway Pensure PFA Limited or electronically via email to dpo@leadway-pensure.com

Handling Data Subject Access Requests

All Data Subject requests received must be forwarded to the office of the DPO within 3 days of receipt. The DPO must continuously track the following regarding Data Subject requests:

- Receipt date of Data Subject request.
- Data Subject's name.
- Requester name (where applicable).
- Assigned employee that will handle Data Subject request.
- Request status (new, in progress, completed).
- Request format.
- Method of identification.
- Data Subject ID.
- Request type.
- Request details.
- Response date

The DPO must maintain records of all correspondence and documentation related to Data Subject requests in a Data Subject Access Request Register.

The DPO must advise the Data Subject in writing that Leadway Pensure PFA Limited received the request and that the Data Subject should expect to receive a response within One month. If the Data Subject submits their request online using a username or other unique identifier and a password, the Data Subject will receive an automated response form confirming receipt of the request.

Data Subject's Rights

Under the NDPA and the NDPR, the Data Subject has some rights including but not limited to the following:

- Information confirming that his Personal Data is being processed as well as all processing activities that are being conducted on his Personal Data.
- Access to his Personal Data in the Company's possession.
- The right to give consent to the processing of his Personal Data as well as the right to withdraw such consent.

- Other supplementary information – this largely corresponds to the information that should be provided in a Privacy Policy. Basically, all the Personal Data provided by the Data Subject to the Data Controller may be requested by the Data Subject
- The Data Subject has the right to obtain, from the Data Controller, confirmation as to whether any Personal Data concerning him or her is being processed, and, where that is the case, access to Personal Data shall be given to the Data Subject to include the following information:
  - The purposes of the processing.
  - The categories of Personal Data concerned.
  - The recipients or categories of recipients to whom the Personal Data has been or will be disclosed, including recipients in third countries or international organizations.
  - Where possible, the envisaged period for which the Personal Data will be stored, or, if it is not possible to determine the period, the criteria used to determine that period.
  - The existence of the right to request from the Data Controller rectification or erasure of Personal Data or restriction of processing of Personal Data concerning the Data Subject or to object to such processing.
  - The right to lodge a complaint with the supervisory authority, the Nigeria Data Protection Commission (NDPC).
  - Where the Personal Data is not collected from the Data Subject, any available information as to their source.
  - The existence of automated decision-making, including profiling at least in those cases, meaningful information about the logic involved, as well as the significance and the envisaged consequences of such processing for the Data Subject.

Verification

We must verify a Data Subject's identity before we can respond to a Data Subject Access Request.

When a DSAR is submitted, an individual must provide verification of their identity using 'reasonable means', this will be required by Leadway Pensure PFA Limited before any data is released to the Data Subject making such request.

The means of identification provided by the Data Subject or other requesters must clearly show their name, photograph, phone number, date of birth, and current address. We accept a photocopy or a scanned image of the following as proof of identity: driver's license, national identification number card, birth or adoption certificate, and international passport. If the Data Subject or other requester changed their name, they must provide relevant documents evidencing the change.

We store all identification documentation provided by Data Subjects on our secure server and only use the identification documentation provided by Data Subjects to respond to the DSAR and not for any other purpose.

The DPO must confirm that the Data Subject provided the required information and verify the Data Subject's identity based on that information. If the DPO cannot verify the Data Subject's identity based on the information provided, or if the Data Subject did not include all the required forms of identification, the DPO must advise the Data Subject in writing that we need additional information to verify the Data Subject's identity.

The DPO should make clear when communicating with Data Subjects that the One-month time frame to respond to a Data Subject Access Request does not start until we receive a fully completed request and proof of identity.

Requests Made on Data Subject's Behalf

A third party may make a request on a Data Subject's behalf. In this case, we require proof of the Data Subject's and third party's identity as well as evidence of the third party's legal right to act on the Data Subject's behalf.

We accept a photocopy or a scanned image of any of the following as proof of the Data Subject's identity: driver's license, national identification number card, birth or adoption certificate, and international passport. If the Data Subjects/ third party changed their name, they must provide relevant documents evidencing the change.

We accept a photocopy or a scanned image of one of the following as proof of the third-party's identity: driver's license, national identification number card, Permanent Voters Card and international passport.

We accept a copy of the following as proof of the third party's legal authority to act on the Data Subject's behalf: a notarized consent signed by the Data Subject or a certified true copy of a Power of Attorney.

We store all documentation provided by third parties regarding their identity and legal authority to act on the Data Subject's behalf on our secure server and only use that documentation to respond to the Data Subject request and not for any other purpose.

The DPO must verify the third party's identity and proof of legal authority to act on the Data Subject's behalf based on the information provided. If the DPO cannot verify the third party's legal authority to act on the Data Subject's behalf, the DPO must advise the third party in writing of the additional information needed to confirm the legal authority.

Fees

DSARs should be dealt with free of charge, unless the request is manifestly unfounded, excessive, or repetitive. In such cases, a reasonable fee may be charged. When communicating this fee to the Data Subject, the regulatory authority, NDPC and any other relevant regulatory body, is to be put in copy.

Data to be released.

As a Data Controller, Leadway Pensure PFA Limited will supply all information available to it, which a Data Subject has requested and is entitled to receive under the NDPA and other relevant data protection legislation.

The DPO is responsible for leading the effort to locate Personal Data relevant to a Data Subject request. The DPO must:

- Identify all departments that might reasonably be considered to hold Personal Data relevant to the request.
- Work with the IT department to collect the Personal Data about the Data Subject from all relevant sources including emails, electronic files and documents, and electronic systems; databases; automated systems; word processing systems; computer hard drives; hard copy files; voice recordings; photographs; back-up files and other sources which may exist from time to time.
- The DPO must review the files, and the documents collected and identify whether the information gathered is Personal Data relevant to the request.
- If the scope of the Data Subject Access Request is unclear or does not provide sufficient information to conduct a search, the DPO must communicate to the Data Subject that we need more specific information to process the request and locate the relevant Personal Data and indicate the information needed.

- The DPO must retain internal documents that show the steps and efforts made to locate relevant Personal Data, including all the search methods used.
- Where the information requested is coupled with other Personal Data, especially relating to other Data Subjects, the DPO shall take steps to extract such requested information such that Personal Data or other unrequested information are not released or exposed.

Response Times

DSARs must be dealt with within One month of receipt of the Data Subject's request unless an exception applies.

If Leadway Pensure PFA is unable to provide the requested information to the Data Subject within the One-month timeline, the Data Subject must be notified with any applicable explanations of the delay. We shall also request an additional period within which such a request will be responded to.

Denial of Request

The DPO in partnership with the legal department must determine if we have a basis not to respond to a Data Subject request.

In the event of a refusal to respond to a Data Subject request, Leadway Pensure PFA Limited shall take steps to copy the regulatory authority, NDPC, when communicating such reasons for refusal to the Data Subject or third party making the request.

If we do not have or process Personal Data related to the Data Subject, the DPO should indicate that we conducted a diligent search for records related to the Data Subject's request and did not uncover responsive results.

Responding to Personal Data Access Requests

Data Subjects have the right to request access to their Personal Data processed by us under the NDPA and the NDPR.

In response to a Data Subject Access Request, the DPO must, unless an exemption applies, provide Data Subjects with the following information about our Personal Data processing activities:

- The purposes of processing.

- Categories of Personal Data processed:
- Recipients or categories of recipients who receive Personal Data from us.
- How long do we store the Personal Data, or the criteria we use to determine retention periods.
- Information on the Personal Data's source if we do not collect it directly from the Data Subject.
- Information on the safeguards we use to secure transfers of Personal Data to foreign countries or to an international organization.
- Whether we use automated decision-making, including profiling, the auto-decision logic used, and the consequences of this processing.
- Their right to request correction or erasure of their Personal Data; restrict or object to certain types of processing with respect to their Personal Data; and make a complaint with the NDPC.

The DPO must unless any exemption applies, provide the Data Subject with a copy of the Personal Data we process about the Data Subject in a commonly used and easily understandable electronic form.

Responding to Rectification Requests

Data Subjects have the right to have their inaccurate Personal Data rectified. Rectification can include having incomplete Personal Data completed, for example, by a Data Subject providing a supplementary statement regarding Personal Data. Where such a request is made, the DPO must rectify the Personal Data without undue delay unless a basis exists to deny the request.

The DPO must identify each third-party recipient of the Personal Data that is the subject of the rectification request and communicate the rectification of the Personal Data to each recipient (for example, our third-party service providers who process the data on our behalf). The DPO must also inform the Data Subject about those recipients if the Data Subject requests it.

The DPO must determine if we have a basis not to respond to the rectification request. The DPO must inform the Data Subject of the reason(s) for not acting and of the possibility of lodging a complaint with NDPC and seeking a judicial remedy.

Responding to Erasure Requests

Data Subjects have the right, in certain circumstances, to have us erase their Personal Data. Where such a request is made, the DPO must, unless an

exemption applies, erase the Personal Data that is the subject of the request if:

- The Personal Data is no longer necessary for the purpose we collected it for.
- The Data Subject withdrew his or her consent to our processing activities and no other legal justification for processing applies.
- The Data Subject objects to processing, including profiling, that is necessary to pursue our or a third party's legitimate interests and there are no overriding legitimate grounds to process the Personal Data.
- The Data Subject objects to processing for direct marketing purposes.
- We unlawfully processed the Data Subject's Personal Data.
- Any relevant law or statute in Nigeria requires us to erase the Personal Data to comply with a legal obligation.

If we determine that we must erase the Data Subject's Personal Data in response to the request, and we made the Personal Data that is the subject of the erasure request public, the DPO must take reasonable steps, including technical measures, to inform other organizations processing the Personal Data of the erasure request, including removing any links to, and copies of, the Personal Data from the public domain.

If we determine that we must erase the Data Subject's data in response to the request, the DPO must identify each recipient to whom we disclosed the Personal Data that is the subject of the erasure request. The DPO must communicate the erasure of the Personal Data to the third-party data recipients, unless the DPO issues a written finding that this is impossible. The DPO must also notify the Data Subjects about those recipients if they request that information.

The DPO must determine if we have a basis not to respond to a Data Subject erasure request and duly inform the Data Subject of the reason(s) for not acting on the request, of the possibility of lodging a complaint with the NDPC and seeking a judicial remedy.

Responding to Data Portability Requests

Data Subjects have the right, in certain circumstances, to:

- Receive a copy of certain Personal Data from us in a structured, commonly used, and machine-readable format and store it for further personal use on a private device.
- Transmit certain Personal Data to another Data Controller.
- Have us transmit certain Personal Data directly to another Data Controller, where technically possible.

The Personal Data covered by the data portability right includes only Personal Data concerning the Data Subject which the Data Subject knowingly and actively provided to Leadway Pensure PFA Limited and includes information such as but not limited to name, contact information, address etc. The data portability right does not include data that we create from the data provided by the Data Subject such as a user profile. If you have any questions about whether Personal Data falls within the scope of a Data Subject portability request, please contact the DPO at dpo@leadway-pensure.com

For Personal Data that the Data Subject requests be transmitted to a third party, the DPO must, unless any exemption applies, transfer the Personal Data that is the subject of the data portability request in an acceptable format. However, if the Data Subject requests a particular format, the DPO should make efforts to transfer the data in that format.

For Personal Data pertaining to Third Parties:

Where the data set includes third parties' Personal Data, we must identify a legal basis under the NDPA or other data protection laws prior to transferring the third parties' data. The DPO must determine whether we have a basis to transfer the third parties' data.

In cases where the DPO determines that we do not have a basis to transfer the Personal Data of third parties, the DPO may give instructions to redact or remove the Personal Data of the third parties prior to transmitting the data in response to a portability request.

In addition to the general grounds for denying a Data Subject request as set out in this Policy, we may also refuse to respond to a Data Subject portability request if responding to the request adversely affects the rights and freedoms of others or is in breach of the provisions of data protection laws, including the NDPA.

The DPO must determine if we have a basis not to respond to a data portability request and will duly inform the Data Subject of the reason(s) for not acting on

the request and of the possibility of lodging a complaint with the supervisory authority and seeking a judicial remedy.

Responding to Objections to Personal Data Processing

Data Subjects have the right to object to Personal Data processing when we process their Personal Data:

- For direct marketing purposes, including profiling related to direct marketing. We must stop processing a Data Subject's Personal Data for direct marketing purposes whenever the Data Subject objects.
- For scientific or historical research purposes or statistical purposes.
- For a task carried out in public interest or processing necessary for our legitimate interests or that of a third party.

The DPO must, unless any exemption applies, stop the processing activities related to Personal Data which is the subject of the Data Subject's request in this regard.

The DPO must determine if we have a basis not to respond to a Data Subject objection request. The DPO must inform the Data Subject of the reason(s) for not acting on such request and of the possibility of lodging a complaint with NDPC and seeking a judicial remedy.

Responding to Automated Decision-Making Objections

Data Subjects have the right, in certain circumstances, not to be subject to a decision based solely on the automated processing of their Personal Data, including profiling, if the decision produces legal or other similarly significant effects on them.

The DPO must determine if the automated decision-making, including profiling, produces legal effects on the Data Subject or affects them in a similarly significant way.

The DPO must, unless any exemption applies, stop the automated decision-making that is the subject of the Data Subject request.

In addition to the general grounds for denying a Data Subject request, we can refuse to grant an automated decision-making objection when the

automated decision is either: necessary for entering or performing a contract with the Data Subject; or authorized by an applicable law.

The DPO must determine if we have a basis for not responding to the Data Subject's automated decision-making objection. The DPO must inform the Data Subject of the reason(s) for not acting and of the possibility of lodging a complaint with the NDPC and seeking a judicial remedy.

Enforcement

Violations or actions contrary to this Policy may result in disciplinary action, in accordance with Leadway Pensure PFA Limited' Information Security Policy and procedures as well as the Human Resources Policy. Please see [HR POLICIES REFERENCE * Staff Handbook & Code of Conduct] for details regarding Leadway Pensure PFA Limited's disciplinary process.

The minimum standards that Leadway Pensure PFA Limited apply to DSARs are demonstrated in the following table:

AIM	ACTION	PERSONNEL RESPONSIBLE
DSAR Policy is to be kept updated to reflect current practices	A plan is to be formed to ensure the regular review and update of the DSAR Policy	**DPO**
Procedures for handling the DSAR Requests are in place	There should be a standard procedure for handling DSARs from the point of receiving the request to the point of responding to the Data Subject.	**DPO**
Designated Personnel for handling DSAR Requests	The Company should have in place personnel assigned to deal with and respond to DSARs	**DPO**
External Guidance	The Company is to have in place a means of guiding Data Subjects in making Data Subject Access Requests	**DPO**
Training	Employees or personnel responsible for handling DSARs need to undergo regular training to handle such requests and related obligations in compliance with the provisions of relevant data protection legislation.	**DPO**
Adequate identification measures	Data Subjects and third parties making requests should be identified before Personal Data is provided to them	**DPO**
Documentation	The Company should keep a log of all DSAR Requests, with full details of the requests and response times. Data Subject Access Requests are to be responded to within One	**DPO**

	month of receipt of such requests	

[SIGNATURE PAGE FOLLOWS]

I, _____ (employee name), acknowledge that on _____ (date), I received and read a copy of Leadway Pensure PFA Limited's Data Subject Access Request Policy, dated [EDITION DATE], and understand that it is my responsibility to be familiar with and abide by its terms. I understand that the information in this Policy is intended to help Leadway Pensure PFA Limited's employees to work together to handle Data Subject Access Requests in compliance with the Nigeria Data Protection Act and other relevant data protection legislation.

_____

Signature

_____

Printed Name

_____