

KINSHIP NIGERIA PRIVACY NOTICE · LEGAL

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Kinship Nigeria Privacy Notice

How Kinship Nigeria handles your information

Who's responsible: Kinship Management Service Limited ("Kinship Nigeria") is the data controller for your care and health information under the Nigeria Data Protection Act 2023.

What we collect: your membership details, including the enrolment details passed to us by Legacy FS Limited when your plan was set up (name, address, date of birth, contact and care-relevant details); your care records (visit notes, check-ins, care manager notes); health information needed to deliver your plan and enrol you for your health benefits; your consultation records with our teleconsultation partner; your consents and choices. We never receive your family's identity documents from the verification process - only confirmation that someone has been verified.

Why: to deliver your care and membership (contract); to enrol you with the Benefit Provider named in your plan, as the holder of the group arrangement - the enrolment details go from us to them, never from Legacy FS Limited directly, and they become their own controller for your benefit and claims records (contract); to handle complaints about your care, kept for as long as we need to show how they were handled and to meet our obligations; to keep you safe (vital interests where relevant); legal obligations.

Sharing: with the Benefit Provider named in your plan, for enrolment and benefits; with our teleconsultation partner, for consultations; with Legacy FS Limited (UK), the independent company that provides the Kinship platform, only as needed to run it, under the written data-sharing agreement between the two companies; **with your family, only what you switch on - every sharing option starts OFF and is yours to change any time.**

Your money, where you pay us: where you contribute in naira towards a plan (your own, or as a supporter), we process those payment records to apply your money, to reconcile refunds - which always return to the way you paid, in naira - and to keep the plan's Kin Fund pocket held with us accounted to the people who contributed it.

Your rights: access, correction, deletion, objection under the Nigeria Data Protection Act - contact privacy@withkinship.ai, one front door for everything Kinship, and we'll make sure it reaches the right people. You can also complain to the Nigeria Data Protection Commission.

Retention: care and health records are kept for as long as Nigerian health-record and legal requirements demand; complaint and payment records for as long as accounting and regulatory rules require. We're finalising the detailed retention schedule and will publish it in this notice.