



**Delta State Contributory Health Commission**  
**Governor's Office**

## **DSCHC Privacy Policy**

The Delta State Contributory Health Commission (DSCHC) is committed to ensuring the protection of personal data. We only use personal data for the purpose of providing services pursuant to our mandate in accordance to the Delta state Contributory health commission Law, 2015 enacted by the Delta State House of Assembly. Our privacy policy is aimed at ensuring that personal data is secure as required under the Nigeria Data Protection Regulation of 2019 (NDPR).

### **The Policy**

By accessing our platforms, or using our services, content, features, technologies or functions offered on our website, digital platforms or visiting any of our offices for official or non-official purposes, you accept to be bound by this Privacy Policy. This Policy supports the provision of our services to individuals, enrollees, health care providers, other stakeholders and the general public under the Delta State Contributory Health Commission Law of 2015.

We may amend this Privacy Policy at any time by posting a revised version on our website, digital platforms or placing such notice at conspicuous points at our office facilities.

### **Your Rights Over Personal data**

This Privacy Policy describes your privacy rights regarding our collection, use, storage, disclosure and protection of your personal information. It applies to the DSCHC website, including ICT platforms used to provide the Delta State contributory health scheme and services. We will oblige you within the limitations of the Law where you choose to exercise any of your rights over your Personal Information. For more information on exercising your rights over your Personal



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Information, you can contact our Data Protection Officer on **[dpo@dschc.org.ng](mailto:dpo@dschc.org.ng)**.

### **Personal data we collect**

Personal data is any information that can be used to identify a specific individual either directly or indirectly. We may collect any or all of the following personal data from you whenever you enroll into the health scheme, claim health benefit, apply for employment, request to provide services, supply goods or products, make a complaint or an inquiry to enable us perform any of our statutory obligations under the Delta State Contributory Health Commission Law of 2015:

- Full name
- Marital status
- Nationality
- DOB (Date of Birth)
- Bank Verification Number (BVN)
- International Passport Number
- Tax Identification Number (TIN)
- Home address
- Contact address
- Email address
- Details of Previous or Current Employment
- Financial Information
- Health Information
- Biometric Data
- Social Media Conversations
- Any other personal information collected, as may be applicable

### **How We Use Personal data**

Personal data collected or processed by the DSCHC is used to provide an efficient and secure service to all our stakeholders. In the



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process of handling or processing personal data, we may use your information to:

- Contact you
- Verify your identity
- Register you into health insurance scheme
- Provide health insurance
- Settle health benefit claims
- Share medical information with medical practitioners
- Provide access to health care services
- Process employment applications
- Refer enrollees to health care providers
- Other purpose(s), as authorized under the DSCHC Law of 2015

### **Our Legal Basis for Processing Personal data**

Our legal grounds for collecting and using personal data as described in this Policy may fall under the following four categories:

1. **Public Interest:** Sometimes we process personal data to satisfy our mandate as a public organization
2. **Legal Obligation:** We may process personal data to perform our legal obligation under the DSCHC Law of 2015
3. **Consent:** In some cases, we may ask you for your consent to process personal data,
4. **Performance of a Contract:** Sometimes we process personal data to perform our obligations under a contractual agreement with you.



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## **Data Retention**

The Commission will retain personal data as long as is necessary to perform a service for you, comply with applicable Laws or regulations, resolve disputes, and enforce our agreements or as is otherwise necessary for the purpose of meeting our legal obligations as the Commission.

## **How We Use Cookies**

Cookies are small files placed on your computer's hard drive that enables the website to identify your computer as you view different pages. Cookies allow websites and applications to store your preferences in order to present contents, options or functions that are specific to you. Like most interactive websites, our website uses cookies to enable the tracking of your activity for the duration of a session.

Our website uses only encrypted session cookies which are erased either after a predefined timeout period or once the user logs out of the platform and closes the browser. Session cookies do not collect information from the user's computer. They will typically store information in the form of a session identification that does not personally identify the user.

You can modify your browser settings to decline cookies because most web browsers automatically accept cookies. This, however, may prevent you from taking full advantage of the DSCHC website.

## **How we protect personal data**

We store and process your personal information on our computers in Nigeria. Where we need to transfer your data to another country, we will endeavor to ensure that we only do so to a country that has to the



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best of our knowledge adequate data protection Law. We will protect your information using physical, technical, and administrative security measures to reduce the risks of loss, misuse, unauthorized access, disclosure and alteration. Some of the safeguards we use are firewalls and data encryption, physical access controls to our data centers and information access authorization controls.

### **How We Disclose Personal data**

Personal data will be shared with or disclosed to other Government Ministries, Departments, Agencies, Health Care Service Providers or other organs of Government when required by Law or by lawful order issued by a court of competent jurisdiction or for the purpose of performing a public function or providing public service.

The sharing of personal information with other Government agencies is subject to the adoption of adequate safeguards for data privacy and security.

### **Securing Your Data**

Only authorized DSCHC and Health Care personnel would have access to personal information. To prevent unauthorized access to your personal information, we have implemented strong controls and security safeguards at the technical and operational levels. This site uses Secure Sockets Layer/Transport Layer Security (SSL/TLS) to ensure secure transmission of personal data.

SSL applies encryption between two points such as your PC and the connecting server. Any data transmitted during the session will be encrypted before transmission and decrypted at the receiving end. This is to ensure that data cannot be read during transmission.

Furthermore, DSCHC has taken measures to comply with best practice Information Security Management Systems (ISMS) by putting in place technical, administrative and physical security measures to



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mitigate or eliminate the likelihood of a data privacy breach or incident.

### **Data Confidentiality Rights**

Your information is regarded as confidential and will not be divulged to any third party except pursuant to legal and/or regulatory requirements. You have the right to request sight of, and copies of any information we keep on you, provided such request is made in compliance with the Freedom of Information Act and other relevant enactments.

### **Links to Other Websites**

Our website may contain links to and from websites of other Government Establishments: Ministries, Departments and Agencies; and/or other Organizations. Anyone who chooses to click on links to websites not under the control of DSCCHC (including, but not limited to our social media accounts) should read the terms of service/use and privacy policies of these third-party service providers and those of any applications visitors use to access them. DSCCHC uses Facebook, Twitter, LinkedIn and YouTube.

Please note that the Commission is not responsible and has no control over websites outside its domain. We do not monitor or review the content of other party's websites which are linked from our website or media platforms. Opinions expressed or materials appearing on third party websites are not necessarily shared or endorsed by us, and the Commission shall not be regarded as the publisher of such opinions or materials. The Commission will not accept any responsibility for any loss or damage in whatever manner, howsoever caused, resulting from your disclosure of personal information to third parties.



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### **Governing Law**

This Privacy Policy is made pursuant to the Nigeria Data Protection Regulation (2019) and other relevant Nigerian Laws, Regulations or International Conventions applicable to Nigeria. Where any Provision of this Policy is deemed inconsistent with a Law, Regulation or Convention, such provision shall be subject to the overriding Law, Regulation or Convention.

### **Questions, Requests & Complaints**

For any questions, requests, or complaints regarding personal data or suggestions to our Privacy Policy, you may contact our Data Protection Officer through the following:

Data Protection Officer

Delta State Contributory Health Commission

**Address:** 10 DBS Road

Asaba

Delta State

**Email:** [dpo@dschc.org.ng](mailto:dpo@dschc.org.ng)

Last updated: November 14, 2021.