

OLD MUTUAL BOTSWANA

CUSTOMER PRIVACY NOTICE

At Old Mutual we are committed to protecting your privacy and to ensure that your personal information is collected and used properly, lawfully and transparently in compliance with the Data Protection Act CAP 42:17 (the “Act”)

This Privacy Notice explains how we obtain, use and disclose your personal information and aims to inform you of your rights and how to exercise them.

This Notice sets out:

- Who we are
- What personal data we collect
- How we collect personal data
- Purposes for which we use your personal data and the legal basis
- To whom we disclose your personal data
- How we retain and safeguard your personal data
- Your rights as a Data Subject
- Cross selling and marketing
- Changes to this notice
- How to contact us
- The Information and Data Commissioner's contact details

1. WHO WE ARE?

“Old Mutual”, “us” or “we” refers to any or all of the Old Mutual businesses in the Old Mutual Group operating in Botswana, including:

- Old Mutual Life Insurance Company (Botswana) Proprietary Limited (OMLICB)
- Old Mutual Short-Term Insurance (Botswana) Limited (OMSTIB)
- Old Mutual Financial Services Botswana Proprietary Limited (OMFSB)

2. WHAT DATA WE COLLECT?

We collect only personal data needed to provide our products and services, including:

2.1 PERSONAL DATA

- **Identification information:** full name, date of birth, national ID, passport details.
- **Contact information:** telephone number, email address, residential and postal address.
- **Financial information:** salary details, bank account information, payment history.
- **Policy and claims information:** policy numbers, cover details, claims history.
- **Employment information:** employer details, occupation, income classification.

2.2 SENSITIVE PERSONAL DATA (ONLY WHEN NECESSARY)

- **Health and medical information:** used for underwriting, claims assessment, and benefits processing (processed with strict safeguards) in relation to policies undertaken by the Data Subject that require knowledge of the Data Subject's health status.
- **Minors (18 and below):** We require verifiable consent from a parent or legal guardian before collecting, using, or sharing the minor's information. Processing of a minor's information will be done where necessary, lawful and through parental authorisation.

3. HOW WE COLLECT THIS PERSONAL DATA

We may collect personal data from:

- The Data Subject, including information about third parties such as your spouse, beneficiaries and/or dependents
- Your employer
- Medical professionals
- Intermediaries/Brokers

You warrant that when you give us personal information about third parties, this information is accurate and correct, and you have received their permission to share their personal information with us for the purposes set out in this Privacy Notice or any other related purposes. If you are giving consent for a person under 18 (a minor), you confirm that you are a competent person and that you have authority to give consent on their behalf.

We may also collect information about you from other sources, such as:

- Third parties for the purposes listed below, for example credit reference and fraud prevention and law enforcement agencies.
- Other insurers to prevent fraudulent claims.
- Other companies in the Old Mutual Group for the purposes listed below, or when we believe it will enhance the services and products we can offer to you, but only where you have not objected to such sharing. This includes supplementing the information that you provide to us with information we receive from other companies in the Old Mutual Group in order to offer you a more consistent and personalised experience in your interactions with Old Mutual, and to ensure that we have updated information about you.

4. PURPOSES FOR WHICH WE USE YOUR DATA AND THE LEGAL BASIS

Legal Basis	Purpose of Processing Your Data
Performance of a contract	To provide our products and services to you, and service insurance policies For underwriting purposes, including but not limited to reinsurance For premium collection To assess and process claims and benefits
Compliance with legal obligations; Legitimate interests	To verify your identity, addresses, banking details To comply with laws and regulatory requirements To maintain accurate records For audit and record keeping purposes In connection with legal proceedings
Legitimate interests	To conduct market or customer satisfaction research or for statistical analysis For debt tracing or debt recovery To trace you when you are uncontactable
Consent	For direct marketing and/or cross selling of our products

5. WHO WE SHARE YOUR DATA WITH

We may share your data with:

- Brokers and intermediaries
- Reinsurers
- Medical service providers (for claims or underwriting of life policies as applicable)
- Loss adjusters and assessors
- Authorised service providers
- Auditors and Regulators where required by law

Transfers of Personal Data outside of Botswana - personal data that we collect from you may be transferred to, and stored at, a destination outside of Botswana. It may also be processed by staff operating outside Botswana who are employees of our third-party providers. Where we transfer your personal data outside the jurisdiction, we endeavor to ensure that there are adequate safeguards in place, in accordance with the Act. By submitting your personal data, and in providing any personal data to us, you agree to this transfer, storing or processing.

6. YOUR DATA RIGHTS

Under the Botswana Data Protection Act, you have a:

- **Right to Access** - request a copy of the personal information we hold about you. A request for such copy may be subject to payment of a legally allowable fee.
- **Right to Rectification** - ask us to correct or update information that is inaccurate or incomplete.
- **Right to Deletion (Erasure)** - request deletion or destruction of your personal information where the law permits, except where Old Mutual is required to retain such data to comply with legal obligations.
- **Right to Withdraw Consent** - withdraw your consent at any time where processing is based on consent.
- **Right to Object to Processing**- object to certain processing activities where you believe they are not justified.
- **Right to Restrict Processing** - ask us to limit how we use your information in specific circumstances.
- **Right to Data Portability** - request your information in a structured, commonly used format to transfer to another service provider (where processing is based on consent or contract).
- **Right to Be Informed** - receive clear information about how your data is collected, used, and shared.
- **Right Not to Be Subject to Automated Decisions** - request human intervention or challenge decisions made solely by automated systems.
- **Right to Lodge a Complaint** - if you are dissatisfied with how we handle your personal Data, you may contact our Group Data Protection Officer or the Information and Data Protection Commission. We will respond within reasonable timelines.

7. HOW LONG WE KEEP YOUR DATA

We retain your personal data only for as long as necessary to fulfill the purposes for which it was collected, including legal, regulatory, and audit requirements.

After this, your information is securely deleted, subject to any other legally imposed retention limits.

8. HOW WE PROTECT YOUR DATA

We take appropriate technical and organisational measures to safeguard your data, including:

- Secure systems and encryption access controls
- Staff confidentiality obligations
- Strict third party data protection requirements
- Physical security
- Retention and disposal of the data

We will, on an ongoing basis, continue to review our security controls and related processes to ensure that your personal information is secure.

When we contract with third parties, we impose appropriate security, privacy and confidentiality obligations on them to ensure that the personal data that we remain responsible for is kept secure.

9. DIRECT MARKETING AND CROSS-SELLING

We may share product or service information with you offered by Old Mutual Group entities, only if you have given explicit consent to do so.

- You may opt out at any time by;
- **Email:** marketing@oldmutual.co.bw
 - **SMS OPT OUT** (where applicable)

Opting out does not affect policy servicing or claims processing.

10. HOW TO CONTACT US

If you have questions or wish to exercise your rights, please contact our Data Protection Office at:

- Email** dataprotection@oldmutual.co.bw
Telephone +267 399 5700/01
Postal Private Bag 00347, Gaborone

Or visit our Branches:

- Gaborone – Block 5, Plot 50676, Fairgrounds Financial Centre
- Francistown – Plot 644, Lobengula Avenue

11. OUR REGULATOR

Note that you have the right to lodge a complaint with the Information and Data Protection Commission at the following address should you believe that any processing of personal data does not adhere to the Data Protection Act.

INFORMATION AND DATA PROTECTION COMMISSION
Ministry of State President
Private Bag 00498
Gaborone
Telephone +267 395 0998

12. UPDATES TO THIS NOTICE

We may update this Notice when required. The latest version will always be available through our branches and digital channels.



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