

BOTSWANA LIFE PRIVACY NOTICE

Overview

The terms of use set out below apply when you visit or use our website, applications, forms, documents, products and other services which are owned, operated, or sponsored by Botswana Life unless specifically provided otherwise. This privacy policy may be supplemented by additional privacy statements, terms or notices provided to you. By using our website, applications, forms, documents, products and other services you agree to comply with the terms herein.

How we collect information

We collect personal information about you and any other person whose details you provide to us in accordance with the relevant laws, either, directly from you when you complete a product or service application form, electronically, telephonically or by way of a hard copy; indirectly from you when you interact with us electronically by way of our website, apps, or social media channels, which may include the collection of metadata (data about data); where relevant, from third-party sources.

We will also collect your information where you have only partially completed and/or abandoned any information which you began to apply to our website and/or other online forms. Given that we already consider you a customer at this stage, we may use this information to contact you in order to remind you to complete outstanding information.

Where we require personal information in order to provide you with our products and services, your failure to provide us with the necessary information, will result in Botswana Life being unable to provide you with our products and services. Where such services include financial advice, the appropriateness of the advice may be compromised if you do not provide complete and accurate information. You are responsible for informing Botswana Life if your information changes.

Collection of information by third parties

Owners or information system administrators of third-party websites that have links to the Botswana Life website, may collect personal information about you when you use these links. Botswana Life does not control the collection or use of personal information by third parties and this privacy statement does not apply to third parties. Botswana Life does not accept any responsibility or liability for third-party policies or your use of a third-party app, platform or service.

Botswana Life also uses certain social networking services such as Facebook, WhatsApp, Instagram and Twitter to communicate with the public and Botswana Life clients. When you communicate with Botswana Life through these services, that social networking service may collect your personal information for its own purposes. These services may track your use of our digital channels on those pages where the links are displayed. If you are logged into those services (including any Google service) while using our digital channels, their tracking will be associated with your profile with those service providers. These services have their own privacy policies which are independent of Botswana Life's privacy policies and practices. Please ensure that you fully acquaint yourself with the terms of any such third-party privacy policies and practices.

Botswana Life will only provide data to third-party information exchange services with your consent.

What information we collect

Your relationship with Botswana Life determines the exact nature of the personal information Botswana Life processes, and the purpose for which such personal information is collected

and used. However, in many cases, if we are handling your personal information as part of our role as an insurer, the personal information we may process includes the following:

- Information about you – for example, your name, identity number, age, gender, date of birth, nationality, occupation, lifestyle, current status of health, medical history and any existing conditions of each person insured. In the event that you make a claim, we may also collect personal information from you about the claim and any relevant third parties. We acknowledge that information about your health is special personal information. Note that we will use that information strictly in accordance with applicable laws and for insurance purposes (including assessing the terms of the insurance contract, dealing with changes to the policy and/or dealing with claims).
- Contact information – in some cases, for example, we may receive your email, address, phone number and postal address.
- Online information – for example, cookies and IP address (your computer's internet address), if you use our websites, apps and/or social media channels.
- Financial information – we may process information related to payments you make or receive in the context of an insurance policy or claim. We may process information regarding your income, expenses, assets, liabilities, investments, retirement and other financial provisions in the context of providing financial advice and intermediary services.
- Contractual information – for example, details about the policies you hold and with whom you hold them.
- Health information such as smoker status or medical-related issues relevant to a policy or a claim you have made.

In certain instances, we may need consent to process your personal information. If you give us your consent for a specific context, you are free to withdraw this consent at any time. Please note that where you have withdrawn your consent, this will not affect the processing that took place prior to such withdrawal and it will not affect the processing of your personal information where consent is not required.

You may refuse to provide us with your personal information in which case we may not be able to provide you with a relevant service or would have to terminate our business relationship. The supply of certain items of personal information, especially those collected to comply with regulation, is legally mandatory.

How we use your information

We have regulatory obligations, including compliance with anti-money laundering legislation, to process your personal information. This includes verifying your identity or the identity of your beneficial owner and/or controlling persons. We are also required by various laws to maintain a record of our dealings with clients.

In order for us to provide clients with the financial products and services they have requested and to notify them of important changes to such products and services, we need to collect, use and disclose the personal information of clients, their representatives, controlling persons of entities, business contacts, staff of clients and service providers.

To the extent permissible under applicable laws, Botswana Life may use your information:

- To provide you with our financial products and services, and maintain our relationship with you;
- To provide you with financial advice and intermediary services;
- To conclude and administer your application, which may include underwriting;
- To execute a transaction in accordance with your request;

- To assess, check, and process claims;
- To meet our contractual obligations with you or take steps necessary for the conclusion of a contract with you;
- To comply with legislative and regulatory requirements, including codes of conduct and requirements of our regulators;
- To undertake credit reference searches and/or verification;
- For the detection and prevention of unlawful activity, fraud, money-laundering and loss, including as part of party due diligence required under applicable laws and in terms of Botswana Life policies;
- For purposes of online login and authorisation;
- To execute the Botswana Life's strategic initiatives;
- To perform any risk analysis or for purposes of risk management to you or our business in general;
- To record and/or monitor and have access to your telephone calls (i.e. voice recordings), correspondence and electronic communications to/with us (or any of our employees, agents or contractors) in order to accurately carry out your instructions and requests, to use as evidence and in the interests of crime prevention;
- To maintain the security of our digital channels and systems;
- For statistical analysis and research purposes;
- For audit and record-keeping purposes;
- For purposes of proof and legal proceedings;
- To enhance your experience when interacting with the Botswana Life and to help us improve our offerings to you;
- To share with other entities in the BIHL Group, so that we can market our financial products and services which we deem similar, with the aim of offering you the opportunity to take up some of the financial products to fulfil your needs, provided that you have not objected to receiving such marketing;
- To conduct market research and provide you with information about our products and services from time to time via email, telephone or other means (for example, invite you to events);
- To process your marketing preferences (where you have unsubscribed from certain direct marketing communications, keeping a record of your information and request to ensure that we do not send such direct marketing to you again);
- For any purpose related to and compatible with the above.

Sharing your information

Botswana Life will only share your personal information with third parties if there is a legitimate reason to do so. We may disclose the personal information you provide to us to the following entities:

- Our third-party service providers who are involved in the delivery and/or administration of financial advice products and services;
- Other third parties in relation to the purposes set out under the previous section (How we use your information);
- Other insurers, public bodies and law enforcement (either directly or through shared databases) for fraud detection and prevention; and
- Reinsurers who provide reinsurance services to Botswana Life and for each other. Reinsurers will use your personal information to decide whether to provide reinsurance cover, assess and deal with reinsurance claims, and to meet legal obligations.

Botswana Life will process and share your personal information with other companies within the BIHL Group for the purpose of facilitating your membership to a loyalty or rewards programme. Your personal information may also be shared with third-party suppliers from time to time for the purpose of facilitating and providing benefits to you by way of a loyalty or rewards programme or when needed to fulfil our contractual obligations to you.

Botswana Life will not sell, rent, or trade your personal information to any third party. Botswana Life will share information about you with financial advisers that are Botswana Life representatives or have intermediary agreements with Botswana Life. Botswana Life may also share information within BIHL Group where it is in Botswana Life's legitimate interest to do so.

Botswana Life will disclose information when lawfully required to do so:

- To comply with any relevant legislation;
- To comply with any legal process; and
- By any regulatory authority (for example, the Non-Bank Financial Institutions Regulatory Authority).

On occasion, Botswana Life may – for legitimate purposes – share aggregated information with its stakeholders and business partners (for example, demographic data) in a manner that does not identify the persons to whom the information applies. However, Botswana Life will not disclose your personal information to third parties unless there is valid processing ground as set out in applicable legislation.

Transfer across borders

Some of the persons to whom we disclose your personal information may be situated outside of the Republic of Botswana in jurisdictions that may not have similar data protection laws to the Botswana. In this regard, we may send your personal information to service providers outside of the Botswana for storage or processing on Botswana Life's behalf. However, we will not send your information to a country that does not have information protection legislation similar to that of the Botswana, unless we have ensured that the recipient agrees to effectively adhere to the principles for processing of information.

Security and storage of information

Botswana Life intends to protect the integrity and confidentiality of your personal information. Botswana Life has implemented appropriate technical and organisational information security measures (including, but not limited to, using encryption for transmission of credit card numbers) to keep your information secure, accurate, current, and complete. However, we cannot guarantee the security of any information you transmit to us online and you do so at your own risk.

Where third parties are required to process your personal information in relation to the purposes set out in this notice and for other lawful requirements, we ensure that they are contractually bound to apply the appropriate security practices.

Your personal information will be held and used for as long as permitted for legal, regulatory, fraud prevention and legitimate business purposes.

Right of access to information

You have the right under privacy and data protection laws, as may be applicable, to:

- a) request access to and correction or deletion of your personal information;
- b) request restriction of our processing of your personal information, or to object to our processing; and
- c) request portability of your personal information
- d) object to our processing of your personal information on reasonable grounds relating to your particular situation, unless legislation provides for such processing.

Marketing

Where you provide your personal information to Botswana Life in the context of a sale of one of our products or services, you agree to Botswana Life sending you information on news, trends, services, events and promotions for our own similar products and or services, always subject to your right to opt out of receiving such marketing at the time your information is collected and on each subsequent marketing communication thereafter.

Particulars of Botswana Life

Botswana Life Insurance Limited is a licensed insurer by the Non-Bank Financial Institutions Regulatory Authority.

Our head office's registered address is Plot 66458, Fairgrounds Office Park, Gaborone, Botswana.