

BOTSWANA INSURANCE COMPANY LIMITED

PRIVACY NOTICE

Last Updated: 04 August 2023

This Privacy Notice describes how Botswana Insurance Company Limited (BIC) collects, uses, discloses, retains and protects your Personal data in accordance with the Data Protection Act (DPA) and other relevant laws.

This Privacy Notice applies to information collected on the BIC website, referred to as our “Website” and anywhere else this Privacy Notice is posted. This Privacy Notice applies to information collected through our digital platforms, our services, our events, and workshops (collectively, our “Services”). This Privacy Notice does not apply to information collected by BIC offline or through any other means not identified here.

Please read this Privacy Notice carefully. By accessing our Websites or using our Services, you agree to us collecting, storing and processing your information in accordance with this Privacy Policy. This Privacy Notice may change from time to time and your continued use of the Websites or Services after we make those changes is deemed to be acceptance of those changes. Please check this page periodically for updates to our Privacy Policy.

1. Who we are

BIC is a general insurance company licensed and regulated by the Non-Bank Financial Institutions Regulatory Authority and operating in Botswana. BIC is a member of the BIHL Group, hereinafter referred to as “the Group”, which constitutes a number of key subsidiaries and associates, including Botswana Life, BIFM, BIFM Unit Trusts and Legal Guard, hereinafter, collectively referred to as “the Group entities”. In this Privacy Notice, any reference to “BIC”, “the BIC Group” or “we” refers to BIC or one or more of its subsidiaries).

2. How we collect information

We collect information in the following ways:

- 2.1. Directly from you when you complete a product or service application form, electronically.
- 2.2. 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;
- 2.3. Indirectly through intermediaries
- 2.4. 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.
- 2.5. Where we require personal data in order to provide you with our products and services, your failure to provide us with the necessary information, will result in BIC being unable to provide you with our products and services. You are responsible for informing BIC if your information changes.

3. Collection of information by third parties

- 3.1. Owners or information system administrators of third-party websites that have links to the BIC website, may collect Personal data about you when you use these links. BIC does not control the collection or use of personal data by third parties and this Privacy Notice does not apply to third parties. BIC does not accept any responsibility or liability for third-party policies or your use of a third-party app, platform or service.
- 3.2. BIC also uses certain social networking services such as Facebook, WhatsApp, Instagram and Twitter to communicate with the public and BIC clients. When you communicate with BIC through these services, that social networking service may collect your personal data 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 BIC's privacy policies and practices. Please ensure that you fully acquaint yourself with the terms of any such third-party privacy policies and practices.

4. **What information we collect**

- 4.1. Your relationship with BIC determines the exact nature of the personal data BIC processes, and the purpose for which such Personal data is collected and used. However, in many cases, if we are handling your personal data as part of our role as an insurer, the personal data we may process includes the following:
 - 4.2. **Information about you** – for example, your name, identity number, age, gender, date of birth, nationality, occupation, health information and address. In the event that you make a claim, we may also collect personal data from you about the claim and any relevant third parties. We acknowledge that information about your health is sensitive personal data. 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).
 - 4.3. **Contact information** – information about how and where we can contact you, including, your email address, physical address, phone number and postal address.
 - 4.4. **Online information** – for example, cookies and IP address (your computer's internet address), if you use our websites, apps and/or social media channels.
 - 4.5. **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 and other financial provisions when providing you with our Services.
 - 4.6. **Contractual information** – for example, details about the policies you hold and with whom you hold them.

In certain instances, we may need consent to process your personal data. 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, however, it may affect our ability to provide you with any or all of our services.

You may refuse to provide us with your personal data 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 data, especially those collected to comply with regulation, is legally mandatory.

5. **How we use your information**

We use, store, and process the information we collect for the following purposes:

- 5.1. To provide you with our insurance and risk products and services, and maintain our relationship with you;
- 5.2. To conclude and administer your application, which may include underwriting;
- 5.3. To execute a transaction in accordance with your request;
- 5.4. To assess, check, and process claims;
- 5.5. To communicate with you about your policy, updates and important notices
- 5.6. To meet our contractual obligations with you or take steps necessary for the conclusion of a contract with you;
- 5.7. To comply with legislative and regulatory requirements, including codes of conduct and requirements of our regulators
- 5.8. To undertake credit reference searches and/or verification, where applicable
- 5.9. 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 BIC Group policies;
- 5.10. For debt recovery or debt tracing;
- 5.11. For purposes of online login and authorisation;
- 5.12. To execute the BIC Group's strategic initiatives;
- 5.13. To perform any risk analysis or for purposes of risk management to you or our business in general.
- 5.14. 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.
- 5.15. To maintain the security of our digital channels and systems.
- 5.16. For statistical analysis and research purposes.
- 5.17. For audit and record-keeping purposes.
- 5.18. For purposes of proof and legal proceedings.
- 5.19. To enhance your experience when interacting with the BIC Group and to help us improve our offerings to you;
- 5.20. Subject to the relevant consents, to share with other entities in the BIC Group, so that we can offer you the opportunity to take up some of the insurance products to enhance your experience and fulfil your needs, provided that you have not objected to receiving such marketing materials.

- 5.21. 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).
- 5.22. 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).
- 5.23. For any other purpose related to and compatible with the above or as may be communicated by us from time to time.

6. **Sharing your information**

6.1. BIC will only share your Personal data with third parties if there is a legitimate reason to do so. We may disclose the Personal data you provide to us to the following entities:

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

6.2. BIC may process and share your Personal data with other companies within the Group for the purpose of facilitating your membership to a loyalty or rewards programme. Your Personal data 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.

6.3. BIC will not sell, rent, or trade your Personal data to any third party. BIC may share information about you with financial advisers that are BIC representatives or have intermediary agreements with BIC. BIC may also share information within the Group where it is in BIC'S legitimate interest to do so.

6.4. BIC will disclose information when lawfully required to do so:

- 6.4.1. To comply with any relevant legislation;
- 6.4.2. To comply with any legal process; and
- 6.4.3. Where required by any regulatory authority (for example, the Non-Bank Financial Institutions Regulatory Authority).
- 6.4.4. On occasion, BIC 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, BIC will not disclose your Personal data to third parties unless there is legitimate grounds to do so as set out in the Data Protection Act.

7. Transfer across borders

Some of the persons to whom we disclose your Personal data may be situated outside of the Republic of Botswana and in jurisdictions that may not have similar data protection laws to Botswana. In this regard, we may send your Personal data to service providers outside of the Botswana for storage or processing on BIC's behalf. However, we will not send your information to a country that does not have information protection legislation similar to or better than that of Botswana, unless such transfer is in line with the Data Protection Act.

8. Security and Storage of Information

8.1. BIC intends to protect the integrity and confidentiality of your Personal data. BIC has implemented appropriate technical and organisational information security measures (including, but not limited to, using encryption) 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.

8.2. Where third parties are required to process your Personal data 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.

8.3. Your Personal data will be held and used for as long as permitted for legal, regulatory, fraud prevention and legitimate business purposes.

9. Right to access and correct personal information

9.1. You have the right to access any of the personal data BIC holds, processes and stores relating to you in line with the procedure for accessing and rectifying personal data defined in BIC's Personal Data Access and Rectification Procedures.

9.2. Should any of your personal data stored and/or processed by BIC be inaccurate or incomplete, you have the right to request that the information be updated in line with the above procedure.

10. Objection to processing of your information

In accordance with Data Protection Act, you may object to our processing of your Personal data on reasonable grounds relating to your particular situation. However, please note that in some instances, such objection may result in BIC not being able to provide you with our products and/or services.

11. Marketing

11.1. Where you provide your Personal data to BIC or any Group entity in the context of a sale of one of our products or services, you agree to such Group entity 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. You may object to receiving direct marketing from BIC or any of the Group entities at any time by contacting the BIC marketing department at **3600 500** or **3600 562**.

11.2. Where you choose to exercise your right to opt out of direct marketing, please allow up to 30 days for BIC to effect that change.

12. **Click Stream Data**

12.1. In the interests of better customer service, BIC may collect anonymous information from visitors to its websites. For example, BIC keeps track of the domains from which people visit its website and also measures visitor activity on its website. In the process, BIC ensures the information cannot be used to identify you. This information is sometimes known as "clickstream data". BIC or its analytics vendors (including Google Analytics) may use this data to analyse trends and statistics and to provide better customer service.

12.2. The information, referred to as traffic data, which may be collected includes:

12.2.1. Your IP address;

12.2.2. The search terms you have used;

12.2.3. The pages accessed on the website and the links you've clicked on;

12.2.4. The date and time you visited the website;

12.2.5. The referring website (if any) through which you clicked through to our website; and

12.2.6. The type of website browser you use.

12.3. As mentioned, the traffic data is aggregated and not personally identifiable and our website analysis will also respect any 'do not track' setting you might have on your web browser.

13. **Cookies**

13.1. A cookie is a small text file that is downloaded onto 'terminal equipment' (for example, a computer or smartphone) when you access a website. It allows the website to recognise your device and store some information about your preferences or past actions.

13.2. **What cookies do we use?**

13.2.1. Some cookies which we use are essential to the functioning of our website. Some cookies help us with the performance and design of our website. This allows us to measure how many times a page has been visited, whether a page has been visited on the website through an advertisement or by other means. Other cookies help us to remember your settings which you may have selected or assist with other functionality when you browse and use our website. This helps us to remember what you have selected, so on your return visit – we remember your preferences.

13.2.2. On certain pages of the website we use cookies to help us understand your interests as you browse the internet, so we can tailor and render to you more personalised content and services in the future. This assists us in delivering relevant advertising to you during various advertising campaigns we may run from time to time through participating third-party sites.

13.2.3. In addition, we also use cookies on certain pages of our website to communicate with third-party data suppliers in order to extrapolate your

digital behaviour. This helps us to understand and target more relevant advertising in the future. The information we receive is all aggregate and anonymous, but will include statistics such as demographics, online behaviour, product interests and lifestyle.

13.3. How do I disable cookies?

If you do not want to receive a cookie from the website, you have the option of setting your browser to notify you when you receive a cookie, so that you may determine whether to accept it or not. However, please be aware that if you do turn off 'cookies' in your browser, you will not be able to fully experience some of the features of the website. For example, you will not be able to benefit from automatic log-on and other personalisation features.

14. Children

While few, if any, of BIC's websites are directed towards children, BIC is committed to complying with all applicable laws aimed at the protection of children and in particular the protection of their Personal data and all data of minors, if any, collected by BIC will be processed in accordance with the Data Protection Act.

15. Updates

This Privacy Notice was last updated on **04 August 2023**. A notice will be posted on the BIC website home page whenever the Privacy Notice is materially changed. Please check the website regularly to ensure that you are aware of the latest version of this Privacy Notice.

16. Questions regarding this notice

Questions, comments and requests regarding this notice may be directed to info@bic.co.bw for clarification.

17. Particulars of BIC

17.1. Should you have a complaint or concern regarding the processing of your Personal data, your complaint may be submitted to info@bic.co.bw

17.2. BIC is a licensed general insurer. Our head office's registered address is **BIC House, Plot 50372, Fairgrounds Office Park, Gaborone.**

17.3. For more information on BIC, please visit our website www.bic.co.bw

18. The Data Protection Commission

While we would appreciate the opportunity to first address any complaints regarding our processing of your Personal data, you have the right to lodge a complaint regarding the collection, use, processing and/or storage of your personal data to the Data Commissioner, whose contact details are:

**The Commissioner
Information and Data Protection Commission
Gaborone
Botswana**