



Privacy Statement

Privacy Statement

At Westlife Insurance Botswana (Pty) Ltd (Westlife) we are strongly committed to protecting your personal data and by upholding privacy, we aim to provide a safe and secure environment for you. The purpose of this Data Privacy Statement is to inform you about how we collect, use, store, make available, disclose, update, safeguard, destroy or process your personal data, further to explain your rights relating to the privacy of your personal information and how the law protects you, and how to get in touch with us for everything and anything concerning your privacy.

Please note that by using our services, you agree to the collection and use of information in accordance with this Data Privacy Statement available on our website, whoever, you may request a copy of the privacy policy from any of our offices.

1. What information we Collect

- Please note that the type of information we collect may include but are not limited to;
- 1.1 Personal Identification Details: such as your name, contact information, date of birth, National ID,
 - 1.2 Financial Information: such as credit or debit card number and bank account details.
 - 1.3 Driving and insurance details: Driving license information, previous insurance policy details, previous accident and claim history, details of any motoring convictions.
 - 1.4 Audio, video and other electronic data: audio, electronic, visual or similar information such as, CCTV footage, photographs, and call recordings.
 - 1.5 Sensitive information and data relating to criminal records and offences: such as health information and some background checking information (i.e. alleged criminal offences and records).

2. Purpose of Processing

- 2.1 The personal data we collect depends on the use of the personal data. The purpose for processing your personal data are detailed below:
- a. Offer, administer and manage the Services provided to you including assessing, underwriting insurance policies, reinsurance processing,
 - b. Administer, investigate and settle claims or complaints in relation to insurance policies and/ or the Services provided
 - c. communicate with you and to respond to your requests, inquiries, comments and concerns.
 - d. carry out due diligence, identity, data validation, anti-money laundering, “Know Your Customer” and other business acceptance, vetting and risk management checks;
 - e. process payments, including your payments for the insurance premium and any mid-term adjustments;
 - f. fulfil legal and regulatory obligations, including applicable prudential rules and industry codes of conduct.
 - g. perform analytics for risk modelling purposes and to analyze trends;
 - h. research, audit, reporting and other business operations purposes,

3. Legal basis for processing:

- We will use the information we collect about you in connection with the Services and for any such use, we rely on an appropriate legal ground. Where processing involves sensitive personal information, we also rely on an additional legal justification to use such information.
- a. Performance of the contract with you to enable us to take steps in offering the services and fulfil our obligations.
 - b. To meet our legal and regulatory obligations as Westlife is regulated by certain industry regulators and is required to provide some Services in accordance with relevant regulatory rules, such as financial and prudential regulations, tax rules, obligations to prevent and detect unlawful activities, among others.
 - c. Consent: You may also provide us with your consent to receive certain Services, marketing or communications from us (where legally required). In such situations, you are not obliged to provide your consent, and you may choose to subsequently withdraw consent at any stage once provided. However, where you refuse to provide information that we reasonably require to provide the Services, we may be unable to offer you the Services and/or we may terminate the Services if not possible to fulfil the Services without the respective information.

4. Recipients of your information

- Westlife may from time to time share your personal information with the following categories of recipients where necessary to offer, administer and manage the Services provided to you.
- a. Within Westlife: we may share your personal information with other Westlife entities, divisions, and subsidiaries for the processing purposes outlined in this Statement.
 - b. Insurance market participants: where necessary to offer, administer and manage the Services provided to you, such as insurers underwriters, reinsurers, Associations of Insurance Underwriters, brokers, intermediaries, assessors, claim investigators, loss adjusters and legal advisors where necessary to defend legal claims, insurance claims or claims similar in nature.
 - c. Internal and external auditors: where necessary for the conduct of company audits or to investigate a complaint or security threat.
 - d. Law enforcement bodies: where necessary to facilitate the prevention or detection of crime or the apprehension or prosecution of offenders.
 - e. Public authorities, regulators and government bodies: where necessary for Westlife to comply with our legal and regulatory obligations.
 - f. Third party service providers: where we outsource our processing operations to suppliers that process personal information on our behalf. These processing operations shall remain under our control and will be carried out in accordance with our security standards and strict instructions.

5. Third country/ International Organisation transfers

Westlife may transfer your personal information to other countries for further processing for the purposes outlined in this Statement. We endeavor to ensure that such transfers comply with all applicable data privacy laws and provide appropriate protection for the rights and freedoms conferred to individuals under such laws.

This may include transfers to countries that the Information and Data Protection Commission consider to provide adequate data privacy safeguards.

Where we transfer personal information to countries that are not subject to an adequacy decision we shall put in place appropriate safeguards, approved by the Commission covered through data transfer agreements which contain standard contractual clauses to ensure that personal information receives an appropriate and consistent level of protection across the entities.

6. CCTV Monitoring

For security and safety purposes, we use CCTV surveillance in certain areas of our premises. CCTV cameras may record images of individuals who enter these areas. The footage is used solely for the ensuring the safety and security of individuals on our premises; preventing, detecting and investing incidents of crime misconduct; monitoring and protecting company property and assets.

7. Direct Marketing

Westlife may send you information about its products and other services and/or products to your contacts shared with us, which may include text messages, emails and other related platforms. If you do not wish to receive such information, you have the right to opt out of receiving such messages at no cost to you by contacting our offices.

8. Data Security

The security of your personal information is important to us, and we have implemented appropriate technical and organizational security measures to protect the confidentiality, integrity and availability of your personal information from unauthorized access, alteration, disclosure , or destruction, to ensure that such information is processed in accordance with applicable data privacy laws.

9. Data Retention

We retain appropriate records of your personal information for as long as is reasonably necessary for the purposes outlined in this statement and compliance with our legal and regulatory obligations on how long to such data is required to be retained.

Where it is no longer required for the outlined purposes, we undertake to securely dispose it in a timely and consistent manner or pseudonymize it.

10. Data subject request rights

- Access and request a copy of your personal data
- Request rectification where accuracy is disputed.
- Request the erasure of your personal information where erasure is subject to legal or statutory obligations to which we are subject.
- Object to the processing of your personal data under certain circumstances
- Right to withdraw consent given for the processing of personal data at any time.
- request that your personal information be provided to you or a third party of your choice in portable form to enable its reuse. That is, in a structured, commonly used and machine- readable format transmittable to another data controller without hindrance. Provided that the processing is based on consent or contract, carried out by automated means, and where technically feasible, directly transmittable.

Please note, the above rights are subject to legal and regulatory requirements.

11. Contact us

If you have any questions about the content of this Statement or the rights conferred to you under the applicable data privacy laws, or a complaint regarding the processing of your personal data, you may contact our office at:

Data Protection Representative: Gofaone Moshoke
Email info: complaints@westlife.co.bw
Contact number: 371 0619
Postal Address: Private Bag BO 256, Gaborone

Data Protection officer: Ms Aobakwe Kwape
Email info:aobakwe.kwape@bstiua.co.bw
Contact number: 73886606/ 74434273
Postal Address: P O Box 715, Gaborone

After engaging us, should your complaint not be addressed to your satisfaction, you have the right to right to lodge a complaint with the Information and Data Protection Commission.

12. Changes to this Statement

This Statement may be amended from times to time in accordance with changes in our regulatory requirements and data protection practices.