



LIBERTY
In it with you

Liberty Privacy and Security Notice

Privacy and security statement

Liberty Holdings Limited (Liberty Group). Liberty Holdings Limited is wholly owned by the Standard Bank Group.

Privacy Statement (Statement)

Liberty Life Botswana is a member of the Liberty Holdings Limited. The Liberty Group is an Africa-focused, client-centric and digitally enabled financial services organisation. We provide comprehensive and integrated financial and finance-related solutions to our clients and operate across the African continent and internationally through our subsidiaries.

Due to the integrated nature of the Liberty business, clients whose primary business is with one entity of the Liberty Group are viewed as clients of the Liberty Group as a whole for client-centricity, information quality and risk management purposes.

In this statement any reference to “the Liberty Group,” “we”, “us” or “our” includes all legal entities within the Liberty Group structure and “clients”, “you” or “your” refers to clients of a legal entity within the Liberty Group.

1.1 Regulation of data privacy and protection

As a client of Liberty Life Botswana, your primary data controller will be Liberty Life Botswana. However, as we operate in various countries and through various legal entities, we comply with the applicable data protection and privacy laws in each of these countries. Accordingly, the specific Liberty Group legal entity that is responsible for determining the purpose and means of processing your personal information (responsible party or data controller), in other words the legal entity who holds the business relationship with you will not always be the same. It will be made clear to you when you take up a product or service, who the responsible party or data controller is.

1.2 What is the purpose and scope of this statement?

The purpose of this statement is to inform you about how we collect, use, store, make available, disclose, update, safeguard, destroy or otherwise deal with (process) your personal information (also referred to as personal data in some countries) and also to explain your rights relating to the privacy of your personal information and how the law protects you.

We may combine your personal information, available across the Group, and use the combined information for any of the purposes set out in this statement where we have lawful grounds for doing so. Your personal information may be processed in another country that does not provide you with the same data protection that the country of origin does (in these circumstances we will give an explanation before requesting your permission to transfer your Personal Information (PI) to such jurisdictions), but we will only transfer personal information to countries that we are satisfied will provide adequate data protection.

Protecting the privacy, confidentiality and security of your personal information is very important to us as it is critical for us to maintain your trust and act in the right way to meet your needs. We have therefore implemented Group-wide policies and procedures to ensure that your personal information is protected.

1.3 What is personal information and what types of personal information do we collect?

Personal information is any information from which you can be identified. The personal information we may collect about you includes:

- Name, age, gender, sex, and identifying numbers;
- Physical and email addresses and contact numbers;
- Online identifiers and your online behaviour such as cookies and IP addresses;
- Engagements with us including use of products or services, transactions, requests,
- Queries, applications and complaints;
- Financial information including with regard to financial behaviour, goals and needs;
- Other personal including biometric details, race or ethnic origin, criminal history and
- Behaviour, medical history and health and your personal beliefs and persuasions such
- As religious, philosophical, trade union membership or political beliefs.

1.4 How do we collect your personal information?

We will collect personal information directly from you or by telephone or through online channels such as our website, mobile applications, Internet Banking or electronic messaging platforms.

We also collect personal information about you from other sources where lawful and reasonable, such as reputable third parties (where you have consented for your PI to be shared for either the express purpose or for any further processing) that you deal with or that the Liberty Group interacts with for the purposes of conducting its business. These third parties include:

- Business partners (including partners and participating partners involved in reward programmes, campaigns or other business activity, joint-venture partners, social media and platform partners) or companies that we may acquire or that merge with us.
- Service providers (including payment processors, card network providers, debt collection and tracing agencies, credit agencies and bureaux, electronic communication service providers, public and private data and data verification providers including data registries, aggregators, search engines, social media and marketing list providers).
- Employers, advisers, agents, associates, assignees, cessionaries, successors in title, trustees, executors, curators and appointed third parties (including lawyers and contractors).
- Government departments, regulatory authorities, courts of law and law enforcement agencies, ombudsmen and tax authorities.

If you are a third-party service provider, we may collect personal information about you as a data subject in order to ensure that the business relationship and matters relating to the agreement between you and us can be fulfilled. You warrant that, if you provide us with any personal information about other persons, such as employees, shareholders or your directors, you are authorised to share their personal information with us for purposes set out in this statement.

Providing your personal information to us is voluntary. However, it is mandatory under certain circumstances, for example when you apply for products and/or services or to comply with anti-money laundering legislation or to fulfil a legal/regulatory obligation. If you fail to provide us with your personal information when requested, we may not be able to provide the products or services to you or comply with our legal obligations.

Whenever you provide us with the personal information of third parties, you must inform them that you need to disclose their personal information to us. We will process the information in accordance with this statement.

1.5 Why do we process your personal information?

Our responsibilities to you are very important to us and we aim to provide you with personalised services to meet your needs. We may process your personal information for any of the reasons outlined in section 1.5.

1. Contract requirements

We may need to process your personal information if we require it to conclude or perform under a contract or agreement with you for a product or service that you have applied for either with us or through our business partners with whom we have entered a partnership, collaboration or alliance arrangement or for purposes of:

- Providing products and services to you that involve opening and maintaining your account, executing transactions, administering claims where applicable, collecting payments due to us by you, managing our risks and maintaining our overall relationship with you;
- Communicating with you regarding the products or services you have with us; or
- Providing you with further information that you request from us regarding the products or services you have with us.

2. Lawful obligations

We may need to process your personal information for the following purposes:

- To complete integrity and business conduct checks required for compliance purposes including due diligence and onboarding processes, monitoring and assurance reviews and conduct sanctions screening against any sanctions lists.
- To comply with other risk management, regulatory and legislative requirements.
- To comply with voluntary and mandatory codes of conduct.
- To detect, prevent and report theft, money laundering, terrorist financing, corruption or other potentially illegal activity, or activity that could lead to loss.
- To process and settle transactions and payments.
- To conduct research and analysis (which may include assessing product suitability, credit quality, insurance risks, market risks and affordability, developing credit models and tools and obtaining related information).

3. Legitimate Interest

Liberty Group may process your personal information in the regular management of its business and to protect the interests of the Group and its clients, depositors, shareholders, employees and other third parties, including our business partners and members of the general public. Liberty Group may process your personal information in order to:

- Maintain, monitor, improve and develop our business policies, systems and controls;
- Maintain and improve data quality;

- Design, develop and test products, services and solutions for clients, which may include combining sources and types of your personal information across multiple legal entities and countries, subject to compliance with applicable laws;
- Personalise and customise products, services and solutions, messaging and advertising;
- Respond to client enquiries and communications and to record these interactions for the purpose of analysis and improvement;
- Manage business emergencies and stress events;
- Process and settle transactions and payments;
- Meet record-keeping obligations;
- Conduct research and analysis (among other things, to assess product suitability, credit quality, insurance risks, market risks and affordability, to conduct behavioural profiling, to develop credit models and tools and to obtain related information);
- Enable clients to use value-added solutions and participate in reward programmes
- Achieve other related purposes.

4. Consent

In addition to the reasons given above, we may process your personal information where we have your specific consent for a defined purpose. We will also seek your consent where applicable laws require it.

We will store your personal information according to our defined retention schedules as provided by the law and thereafter delete it.

1.6 Where will we process your personal information?

Due to the integrated nature of the Group's business and to provide you with efficient access to our products and services, we may process your personal information in South Africa or in countries where we have a presence and where our products or services are provided or where our third-party service providers operate. We will only transfer personal information to countries that we are satisfied will provide adequate data protection, and we have incorporated data privacy addendums/clauses into all our third-party service provider agreements.

Integrated processing holds the following benefits for you:

A single, holistic view of your information that helps us to manage your client profile, authenticate your identity and protect you against fraud.

Improved business processes and service delivery (and less duplication of information provided).

1.7 For How long do we retain your personal information?

We retain your personal information in line with our legal and regulatory obligations and for our business and operational purposes as highlighted above. This will generally be for at least 20 years from your last transaction with us.

1.8 How will we communicate with you?

Besides in-person communication, we use a wide array of channels to engage with you regarding your existing products and services and to keep you updated. These include SMSes, email, phone calls, automated calls, notifications sent to your mobile device and in-app notifications. We need to keep you up to date on an ongoing operational basis about your

existing products and services and their new features especially where we are making them more secure and as we make insurance and other financial services more convenient for you. We may contact you through these means for research purposes or to communicate with you for marketing of new products or services as explained in greater detail below.

1.9 How do we use your personal information for marketing?

If you are an existing client with whom we have had previous interactions in respect of your financial well-being or needs, you are important to us and therefore we would like to share information about our products, services and special offers with you (subject to applicable local laws).

If you are a prospective client, and we have had no previous interaction or have no relationship with you, we will seek your express consent in compliance with local laws to market to you electronically.

If you no longer wish to be contacted for marketing purposes, you may opt out at any time as per the instructions contained in any marketing communication you receive. You can also opt out by contacting us via email at customervoice@libertygroup.co.bw.

You also have the right at any time to stop us from contacting you by any means for marketing purposes.

1.10 When, how and with whom will we share your personal information?

We share information with vendors, auditors, service providers and advisers supporting our services to you, with our trusted partners to introduce products and services to you, with agencies and other financial institutions on credit, fraud and risk matters, with data validation and trust providers to verify your data and identity and with the relevant local and foreign government and other authorities as required by law.

We take extra care when we transfer or share information and will enter into suitable contracts with the trusted parties with whom we share your information, thus ensuring your rights under relevant data protection legislation are upheld.

1.11 How is your personal information protected?

The security of your personal information is important to us and we take reasonable steps to keep your personal information safe and to prevent loss, destruction of and damage or unlawful access to your personal information by unauthorised parties. We require the same level of security to be implemented by our service providers and other third parties. However, you must not share or send us any personal information through unauthorised channels, as these are not a secure way of communication and carry a risk of interception and unauthorised access. You should only share personal information through our authorised channels.

1.12 What are your rights?

We value your trust and want you to be familiar with your rights under the legislation and to know how you can exercise them in your interactions with Liberty Group. You have the right to:

- Access the personal information we hold about you and to correct and update your information;
- Object to our processing your personal information, where applicable;
- Request that we delete your personal information where appropriate;

- Be notified that your personal information is being collected by us or has been accessed or acquired by an unauthorised person;
- Object to the processing of personal information for the purposes of direct marketing; not be subject to automated decision-making processes in respect of an application for products and/or services, except under certain circumstances; and
- To request reasons or make a representation to us if your application for products and/or services is refused.

1.13 Use of cookies on our website

A “cookie” is a small text file that is stored on your computer, smartphone, tablet or other device when you visit a website or use an application. It helps to distinguish you from other users and contains specific information related to your use of our website or application, such as your login details and your preference settings, and helps the website or the application to recognise your device.

Cookies help to make a website or app function better and make it easier for us to give you a better user experience on our online channels. To use or store cookie types that are not required for the functioning of the website or app and are optional, we will obtain your consent first.

For this reason, we limit our use of cookies to:

- Providing products and services that you request;
- Delivering advertising through marketing communications;
- Providing you with a better online experience and tracking website performance; and helping us make our website more relevant to you.
- We use the following types of cookies on our online channels, such as our website.
- Strictly necessary cookies
- These cookies are mandatory and are required for the effective operation and functioning of our website on your device. They enable you to use the website and the features on the website and cannot be switched off.
- Performance cookies
- These are optional cookies that collect information about how you use the website but not any personal information. Performance information is anonymous and mostly statistical and is used to improve the performance of our website.
- Marketing cookies or advertising cookies
- These cookies are also optional and are used to deliver and display advertisements that are relevant and engaging for you as the user. They help us measure how effective our advertising campaigns are by your interaction with the advertisement.

- **Session cookies**

These cookies are temporary and optional and only exist while you browse our website to remember your activities on the website. As soon as you close the website or move to a different website, the cookies are deleted.

- **Persistent cookies**

These are permanent, optional cookies that are stored on your device until they reach a set expiry date or until you delete them. They remember your preferences or actions on our website (or in some cases across different websites). We may use them for various reasons, for example to remember your preferences and choices when you use our website, or to display relevant advertising campaigns to you.

- **First-party cookies**

These are cookies that we create and store when you use our website and relate to information obtained directly from you.

- **Third-party cookies**

These cookies are owned and created by a third-party that provides a service to us such as social media sharing, website analytics or content marketing. These cookies are intended to collect information directly from you by us and we share the personal information with the third-party through the cookies that the third-party stores on our website.

Once you select your cookie preferences you can always change them later by enabling or disabling them. Where we use cookies to collect personal information, it will always be done in accordance with this statement. You can stop your browser from accepting cookies, but if you do, some parts of our websites or online services may not work properly. We recommend that you allow cookies. Explore the settings and options on your browser to disable or enable them or visit <https://www.aboutcookies.org> for detailed information about managing cookies.

1.14 Social Media

When you engage with us through our social media accounts, your personal information may be processed by the social media platform owner. This process is outside our control and the processing activities may be in a country outside of Botswana that may have different data protection laws. For more information about the privacy practices of a social media platform, please refer to and read the terms and conditions of that social media platform before you use it or share any personal information on it.

Our social media accounts are not appropriate forums to discuss our clients' products or financial arrangements. We will never ask you to share personal, account or security information on social media platforms. We may, however, ask you to message us in private through one of our official social media accounts.

1.15 General

We may change this statement from time to time in accordance with changes in our products or services or regulatory requirements. We will make reasonable efforts to notify you through suitable communication channels.

Should you have any queries relating to the processing of your personal information by Liberty Life Botswana, please contact our Data Privacy Officer at:

Physical Address: Plot 70667, Fairscap Precinct, 6th Floor, Fairgrounds, Gaborone, Botswana

Data Privacy Officer
Private Bag 00168
Gaborone, Botswana
Tel: 3180262
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