



LIBERTY
In it with you

Liberty Privacy and Security Notice

Liberty Privacy and Security Notice

Your right to privacy and security is very important to us. The Liberty Holdings Limited and its subsidiaries, (Liberty, we, us, our) treat personal information as private and confidential.

How and why we collect personal information

- We collect personal information for the purposes set out in this notice or as otherwise communicated to you.
- We will collect only the information that is required to give effect to your contract or service.
- We collect personal information directly from you when you purchase our products, contact us directly or provide information through this website.
- We may collect from, and share, your personal information with selected third parties to ensure we meet our responsibilities as a registered long-term insurer and authorised financial services provider. These third parties may include, but are not limited to:
 - Regulatory bodies
 - Financial Advisers and other intermediaries
 - Member companies of the Liberty Group
 - Credit bureaus
 - Other insurers or authorised financial services providers for prevention of fraud
- We collect personal information from and about you for the following purposes, but not limited to:
 - Fulfil mutual contractual/service obligations
 - Assess your individual requirements accurately
 - Deliver effective and personalised services to you that comply with applicable regulations.
 - Carry out statistical and other analyses to identify potential markets and trends, evaluate and improve our business (this includes improving existing and developing new products and services)
 - Inform you about services and products available within the Group
 - Constantly improve our offerings to suit your unique needs

- To verify your identity
- Conduct credit checks
- Regulatory reporting
- Comply with relevant regulatory requirements, including monitoring and analysing your account for credit, fraud, compliance and other risk-related purposes as required by law.
- As otherwise allowed by law

Without your personal information, we may not be able to provide or continue to provide you with the products or services that you need.

Transfer across borders

Liberty Group operates in several countries and, as such, personal information may be shared with group companies in other countries and processed in those countries under the privacy rules that bind the group.

Sometimes we will process your personal information in other countries, either to carry out your instructions or for ordinary business purposes. These countries may not have the same level of protection. We will only process your personal information based on a lawful basis as stipulated by Privacy Laws. If necessary, we will contractually oblige the party to whom we transfer your personal information to uphold our privacy principles, associated policies and practices.

Storage

We store personal information as required by law.

Your records will be deleted after the legal retention period has expired. However, it is possible that we may keep it for longer for legitimate business purposes or for the purpose of analytics. When this happens, all appropriate security controls will be in place to ensure security, integrity and confidentiality.

Our use of technology to follow your use of our website

Cookies

We collect and examine information about visits to this website. We use this information to find out which areas of the website people visit most. This helps us to add more value to our services. This information is gathered in such a way that we do not get personal information about any individual or their online behaviour on other websites. We may use any of the cookie types shown below.

We use cookie technology on some parts of our website. Cookies are small pieces of text that are saved on your Internet browser when you use our website. The cookie is sent back to our computer each time you visit our website. Cookies make it easier for us to give you a better experience online. You can stop your browser from accepting cookies, but if you do,

some parts of our website or online services may not work. We recommend that you allow cookies.

Types of cookies

Session cookies

Session cookies, also known as 'temporary cookies', help websites recognise users and the information provided when they navigate through a website. Session cookies only retain information about a user's activities for as long as they are on the website. Once the web browser is closed, the cookies are deleted. These are commonly used on shopping websites or e-commerce websites.

Permanent cookies

Permanent cookies, also known as 'persistent cookies', remain in operation even after the web browser has closed. For example, they can remember login details and passwords, so web users don't need to re-enter them every time they use a site.

First-party cookies

First-party cookies are installed directly by the website (i.e. domain) the user is visiting (i.e. the URL shown in the browser's address bar). These cookies enable website owners to collect analytics data, remember language settings, and perform other useful functions that provide a good user experience.

Third-party cookies

Third-party cookies are installed by third parties with the aim of collecting certain information from web users to carry out research into, for example, behaviour, demographics or spending habits. They are commonly used by advertisers who want to ensure that products and services are marketed towards the right target audience.

Flash cookies

Flash cookies, also known as 'super cookies', are independent of the web browser. They are designed to be permanently stored on a user's computer. These types of cookies remain on a user's device even after all cookies have been deleted from their web browser.

Marketing by post, email or text messages

If you give us permission, we may use your personal or other information to tell you about products, services and special offers from us or other companies that may interest you. We will do this by post, email or text message (SMS). If you later decide that you do not want us to do this, please contact us and we will stop doing so. This may be done by emailing us at customervoice@libertygroup.co.bw or call us at 3180262.

Third parties

We ask other organisations to provide support services to us. When we do this, they must agree to our privacy policies if they need access to any personal information to carry out their services.

Our website may contain links to or from other websites. We try to link only to websites that also have high standards and respect for privacy, but we are not responsible for their security and privacy practices or their content. We recommend that you always read the privacy and security notices on these websites.

When we may reveal personal information without consent

We will not disclose your personal information to anyone outside Liberty or certain of our service providers without your permission, except when:

- we are obliged do so by law or in terms of a court order
- it is in the general welfare of the public
- we need to do so to protect our rights
- there is a legitimate purpose for the sharing.
- Other members of Liberty Group, connected companies, subsidiary companies, associates, cessionaries, partners, contractors, authorised agents, Joint Venture partners.
- Group employees, as required by their employment conditions
- Parties that you have authorised to obtain on your behalf
- Attorneys, tracing agents, and other persons that assist with the enforcement of contractual agreements.
- Courts of law or tribunals that require personal information to adjudicate referrals, actions or applications.
- Law enforcement and fraud prevention agencies
- Trustees, executors or curators appointed by a court of law.

When will we use customers' personal information to make automated decisions about them?

Where the law allows, Automated decisions make use of your personal information to reach a decision without humans involved. This decision may influence you and you have the right to query such decision and Liberty is obliged to provide the reason(s) for the decisions as far as reasonably possible.

Our security practices

- We are committed and obliged to implement all reasonable controls to safeguard access to your personal information.
- Where third parties are required to process your personal information in relation to the purposes set out in this notice and for other legal requirements, we ensure that they are contractually bound to apply the appropriate security practices.
- All use of our website and transactions processed through it are protected by encryption (secret codes) in line with international standards.
- We may share with, or receive, personal information from parties as set out above, where these parties reside outside the Republic of Botswana.

Your right to access information (Data Subject Rights)

You have the right to:

- request access to the personal information we process about you.
- object to the processing of your personal information
- request the deletion of your records
- lodge a complaint regarding the processing of your personal information.

If you have any questions regarding this, please let us know on customervice@libertygroup.co.bw

Privacy and security statements that apply to specific online services

Different online services or businesses of Liberty may have their own privacy and security policies because the service or product they offer may need different or extra policies. These specific policies will apply to your use of the service where they are different from our general policies.

Personal use of emails and notice about checking on emails

Our communication and information systems are for business use. However, we realise that our employees occasionally use our systems for personal use. Personal use includes sending or receiving personal emails within or outside Liberty. Whilst our employees are bound by strict usage policies and security safeguards, we do not accept responsibility for the contents of personal emails sent by our employees using our systems. Please note that we may intercept, check on and delete any communications created, stored, sent, or received using our systems, according to any law that applies.

Right to change this privacy and security notice

We may, from time to time, amend this privacy and security notice in keeping with amended legislation or business practices. We will effect all changes on our website. The latest published version of our privacy and security notice will replace all earlier versions of it, unless otherwise stated.

Email us on customervice@libertygroup.co.bw if you have any questions about this privacy and security notice.

Contact person

All requests for information must be directed to the following address:

Data Privacy Officer
Private Bag 00168
Gaborone, Botswana
Tel: 3180262
customervice@libertygroup.co.bw

Liberty endeavours to process your information in an open and transparent manner and you may contact the Data Privacy Officer should you feel otherwise.