



## Privacy statement

### Absa's commitment to information privacy

#### At Absa, we treat your personal information responsibly

1. Absa Life Botswana (Pty) Limited, a registered Insurer in the Republic of Botswana, a subsidiary of Absa Group Limited, with company Registration Number BW 00000669152: and with its registered office at: 1st Floor, Block B , Plot 50676, Fairgrounds Office Park, Gaborone, Republic of Botswana,
2. Absa promises to treat all your personal information carefully and responsibly.
3. Personal information includes any information that lets Absa identify you as a unique individual, such as your name/s and surname combined with your physical address, contact details and/or passport/identity number.
4. Personal information also refers to the personal information that uniquely identifies a legal entity, such as the trading name of a company combined with the company registration number.
5. Special personal information includes that which details your race or ethnic origin, religious and philosophical beliefs, political persuasion, trade union membership, health or sex life, biometric information or any criminal behaviour which relates to alleged criminal offences or proceedings.
6. Personal information may be given to or collected by Absa in writing as part of a written application form, electronically (email), telephonically, online (absa.co.za or absa.africa)
7. Processing of personal information includes any initial processing that Absa does when we first collect your personal information. It also includes any further and ongoing processing that Absa is allowed to carry out legitimately in terms of the reasons listed in paragraph 9 (below). The term 'processing' includes collecting, using, altering, merging, linking, organising, disseminating, storing, retrieving, disclosing, erasing, archiving, destroying or disposing of personal information.

#### Your personal information is an important part of Absa's relationship with you.

8. Personal information may be given to or collected by Absa in writing as part of a written application form, electronically (email), telephonically, online (absa.co.za or absa.africa)
9. Absa may process your personal information to protect your or our legitimate interests. Absa will not collect and process personal information about you that we do not need for this purpose. The general purposes for which Absa collects and processes your personal information include, but are not limited to:
  - 9.1. Creating a record of you on our system to verify your identity, provide you with the products and/or services you have applied for and then communicate with and keep you informed about these products and/or services;
  - 9.2. Assessing whether you qualify for credit, or an increase or decrease of your credit limit;
  - 9.3. Identifying you and verifying your physical address, source of income and similar information;
  - 9.4. Assessing your personal financial circumstances and needs before providing advice to you;
  - 9.5. Any purpose related to the prevention of financial crime, including sanctions screening, monitoring of anti-money laundering and any financing of terrorist activities;



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- 9.6. Further processing for historical, statistical or research purposes where the outcomes will not be published in an identifiable format;
  - 9.7. Providing income tax-related information to tax authorities;
  - 9.8. For purposes relating to the sale or transfer of any of our businesses, legal entities or assets as part of corporate transactions;
  - 9.9. Where you have applied for employment at Absa, we perform applicant screening and background checks;
  - 9.10. Where you are an Absa employee (including contractors), we create an employment record of you on our system to facilitate continuous monitoring during your employment with us;
  - 9.11. Where you are an Absa director, we create a record of you as a director on our system;
  - 9.12. Where you've been identified as a next of kin by an employee or customer, we create a record of you on our system; and
  - 9.13. Where you are a supplier to Absa, we process your personal information for due diligence, risk assessment, administrative and payment purposes.
10. Furthermore, Absa will not process your special personal information unless:
- 10.1. You have consented to Absa processing it;
  - 10.2. It is necessary to exercise or defend a right or obligation in law;
  - 10.3. It is necessary to comply with an international legal obligation of public interest;
  - 10.4. It is for certain historical, research or statistical purposes that would not adversely affect your privacy; or
  - 10.5. You have deliberately made your information public.
11. There are some personal information fields that you have to fill in if you want Absa to provide you with your chosen product and/or service or onboard you as an employee, supplier, director or job applicant. This information can be provided in writing, electronically or telephonically, but it must be accurate and complete. These fields are indicated by an asterisk (or as otherwise indicated) on the respective forms/websites. If Absa does not receive the necessary personal information, we will not be able to continue with your application. If you are already (an) customer/employee/supplier/director, Absa asks you for this information, and you do not provide it, Absa will have to suspend the provision of the product and/or services for a period of time, or as the case may be, even terminate our relationship with you.
12. In most cases, personal information will be collected directly from you, but there may be other instances when Absa will collect personal information from other sources. These may include public records, places where you may already have made your personal information public (for example, on social media), credit bureaus, or individuals/directors whom you have appointed as your representative, where you are a corporate entity. Absa will only collect your personal information from other sources where we are legally entitled or obliged to do so, and you are entitled to ask Absa which sources they used to collect your personal information.



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13. For the purposes outlined in paragraph 9 (above), Absa will, in most instances, collect and process your personal information internally. However, there are times when Absa needs to outsource these functions to third parties, either within Absa or external to Absa, including parties in other countries. Where your personal information is shared internally within Absa, such sharing will be carried out only for the purposes outlined in paragraph 9 (above). Absa may also need to share your personal information with external organisations, such as credit bureaus, tax authorities or other regulatory or industry bodies, so that we can meet our due diligence or regulatory requirements. We may need to share your personal information with our business partners or counter-parties, where we are involved in corporate transactions relating to the sale or transfer of any of our businesses, legal entities or assets. Absa will not share your personal information with third parties who do not need your personal information, or where Absa is not legally permitted to do so. When Absa decides to transfer your personal information to third parties, we will only provide it to organisations that have the same data privacy policies as Absa or those who are subject to laws relating to the processing of personal information that are similar to those that apply to Absa.
14. There may be instances where Absa will process your personal information through a secure automated tool, or perform profiling resulting in a decision that may affect you significantly. If you are unhappy about the outcome of such a decision, please contact:
  - 14.1. your Local Customer Service centre (for customers);
  - 14.2. your resourcing consultant (for job applicants);
  - 14.3. your people business partner (for employees);
  - 14.4. your supplier relationship manager (for suppliers); or
  - 14.5. Absa's Group Secretariat office (for directors of Absa-owned companies).

### Absa respects your rights

15. As a customer, if you have opted out of receiving electronic marketing communications (on media such as SMS, email or automated calling machines), Absa will not market to you using electronic media. However, if you are receiving marketing via electronic media, you have the right to opt out at any time by following the instructions on the marketing material received. Absa will continue to market to you using telephonic means until such time you have opted out.
16. As a non-customer, if you would like to receive marketing information from Absa through electronic media, please submit your details to Absa in writing.
17. To the extent that local legislation permits or if you are a resident of the European Union or United Kingdom, you have the following rights regarding your personal information:
  - 17.1. The right to access your personal information that we have on record, where applicable.
  - 17.2. You have the right to ask Absa to correct any of your personal information that is incorrect. These requests must be sent to us in writing.



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- 17.3. You can ask Absa to delete or destroy your personal information. You can also object to Absa processing your personal information. These requests must be sent to Absa in writing. However, the result of such a request will be that Absa may have to suspend the provision of products and/or services for a period of time, or even terminate our relationship with you. Absa's records are subject to regulatory retention periods, which means that Absa may not be able to delete or destroy your personal information immediately upon request.
- 17.4. You may also ask Absa to port your personal information to another party in terms of applicable European Union and United Kingdom data privacy legislation. These requests must be sent to us in writing.
18. If you have a complaint relating to the protection of your personal information, including the way in which it has been collected or processed by Absa, please contact us using the local contact details as listed below. If you have not had your complaint dealt with satisfactorily, you may lodge a complaint with your local privacy regulator in terms of applicable privacy laws.

### Right to amend this privacy statement

Absa reserves the right to change this statement at any time. All changes to this statement will be posted on the website. Unless otherwise stated, the current version shall supersede and replace all previous versions of this statement.