
Protection of Personal Data

EXTERNAL PRIVACY STATEMENT

1. Introduction

- 1.1 For purposes of this Statement:
 - 1.1.1 "Applicable Laws" means all laws and regulations that Bryte is required to comply with.
 - 1.1.2 "Client" or "you" means any prospective, new or existing client of Bryte and its subsidiaries.
 - 1.1.3 "Bryte" or "we" or "us" means Bryte Risk Services Botswana.
- 1.2 This Statement sets out how Bryte will use your personal data and applies to any information, including personal and sensitive personal data, you give to Bryte or which Bryte may collect from third parties.
- 1.3 It is important that you read this Statement carefully before submitting any personal data to us.
- 1.4 By submitting any personal data to Bryte you provide consent to the processing of your personal information as set out in this Statement.
- 1.5 The provisions of this Statement are subject to mandatory, unalterable provisions of Applicable Laws;
- 1.6 Please do not submit any personal data to Bryte if you do not agree to any of the provisions of this Statement. If you do not consent to the provisions of this Statement, or parts of the Statement, Bryte may not be able to provide its products and services to you.

2. How to contact us

If you have any comments or questions about this Statement, please get in touch with the compliance department at 363 5000.

3. Amendment of this Statement

- 3.1 We may amend this Statement from time to time for any of the following reasons:
 - 3.1.1 to provide for the introduction of new systems, methods of operation, services, products, property offerings or facilities;
 - 3.1.2 to comply with changes to any legal or regulatory requirement;
 - 3.1.3 to ensure that our Statement is clearer and more favourable to you;
 - 3.1.4 to rectify any mistake that may be discovered from time to time; and/or
 - 3.1.5 For any other reason which Bryte, in its sole discretion, may deem reasonable or necessary.
- 3.2 Any such amendment will come into effect and become part of any agreement you have with Bryte when notice is given to you of the change.

4. Privacy and indemnity

Bryte is committed to ensuring the privacy and integrity of your information. We take your privacy and the protection of your personal data very seriously, and we will only use your personal data in accordance with this Statement and applicable data protection legislation. It is important that you take all necessary and appropriate steps to protect your personal data yourself (for example, by ensuring that all passwords and access codes are kept secure).

We have implemented reasonable technical and operational measures to keep your personal data secure. Bryte does not control the confidentiality, access to, or dissemination of information retrieved through the use of "cookies" or information retrieved through the collecting and storing of IP addresses of visitors to this website.

You hereby indemnify and hold Bryte harmless from any loss, damages or injury that you may incur as a result of any unintentional access or acquisition of your personal information by unauthorised persons or the provision of incorrect or incomplete personal information to Bryte.

5. Information which we may collect about you

5.1 We may collect the following data about you: not an exhaustive list:

- 5.1.1 your name, address, contact details, date of birth, place of birth, identity number, passport number, bank details, details about your employment, tax number and financial information;
- 5.1.2 records of correspondence or enquiries from you or anyone acting on your behalf;
- 5.1.3 details of transactions you carry out with us;
- 5.1.4 details of contracts and sales you carry out with us;
- 5.1.5 sensitive or special categories of personal data, including biometric information, such as images, fingerprints and voiceprints.

5.2 Where you provide us with the personal data of third parties you should take steps to inform the third party that you need to disclose their details to us, identifying us. We will process their personal data in accordance with this Statement.

6. How we collect information

- 6.1 You may provide personal data to us either directly or indirectly (through an intermediary acting on our behalf or your behalf, a representative or an introducer), by completing an application for our products and services or requesting further information about our products and services, whether in writing, through our website, over the telephone or any other means.
- 6.2 We may also collect your personal data from your appointed intermediary, any regulator, or other third party that may hold such information.

7. Use of information collected

- 7.1 We may use, transfer and disclose your personal data for the purposes of:
 - 7.1.1 providing you with the services, products or offerings you have requested, and notifying you about important changes to these services, products or offerings;

- 7.1.2 managing your policy or relationship and complying with your instructions or requests;
 - 7.1.3 detecting and preventing fraud and money laundering and/or in the interest of security and crime prevention;
 - 7.1.4 assessing and dealing with complaints and requests;
 - 7.1.5 operational, marketing, auditing, legal and record keeping requirements;
 - 7.1.6 verifying your identity or the identification of your beneficial owner (in the case of legal entities);
 - 7.1.7 transferring or processing your personal data outside of the Republic of Botswana to such countries that may not offer the same level of data protection as the Republic of Botswana, including for cloud storage purposes and the use of any of our websites;
 - 7.1.8 complying with Applicable Laws, including lawful requests for data received from local or foreign law enforcement, government and tax collection agencies;
 - 7.1.9 recording and/or monitoring your telephone calls and electronic communications to/with Bryte in order to accurately carry out your instructions and requests, to use as evidence and in the interests of crime prevention;
 - 7.1.10 conducting market research and providing you with information about Bryte's products or services from time to time via email, telephone or other means (for example, events);
 - 7.1.11 where you have unsubscribed from certain direct marketing communications, ensuring that we do not send such direct marketing to you again;
 - 7.1.12 disclosing your personal data to third parties for reasons set out in this Statement or where it is not unlawful to do so;
 - 7.1.13 monitoring, keeping record of and having access to all forms of correspondence or communications received by or sent from Bryte or any of its employees, agents or contractors, including monitoring, recording and using as evidence all telephone communications between you and Bryte; and
 - 7.1.14 Improving or evaluating the effectiveness of Bryte's business or products, services or offerings.
- 7.2 We may from time to time contact you about services, products and offerings available from Bryte or specific subsidiaries which we believe may be of interest to you, by email, phone, text or other electronic means, unless you have unsubscribed from receiving such communications. You can unsubscribe from receiving such communications by clicking [here](#).

8. Disclosure of your information

Your personal data may be shared with Bryte's subsidiaries, our intermediaries/ representatives, and sub-contractors, and selected third parties who process the information on our behalf.

8.1 We may also disclose your personal data to third parties in the following circumstances:

- 8.1.1 To any other of Bryte's subsidiaries or other third parties to:

- 8.1.1.1 assess and monitor any of your applications for Bryte's products or services;
 - 8.1.1.2 determine which products and services may be of interest to you and/or to send you information about such products and services, unless you object or choose not to receive such communications;
 - 8.1.1.3 have a better understanding of your circumstances and needs to provide and improve Bryte's products and services.
- 8.1.2 to any relevant person and/or entity for purposes of prevention, detection and reporting of fraud and criminal activities, the identification of the proceeds of unlawful activities and the combating of crime;
- 8.1.3 to any regulator or supervisory authority, including those in foreign jurisdictions, if Bryte is required to do so in terms of Applicable Laws;
- 8.1.4 to a prospective buyer or seller of any of our businesses or assets;
- 8.1.5 to any person if we are under a duty to disclose or share your personal information in order to comply with any Applicable Laws, or to protect the rights, property or safety of Bryte, Clients or other third parties; and/or
- 8.1.6 To your /intermediary or any other person acting on your behalf, and/or an introducer.
- 8.2 We may transfer your data to another of Bryte's entities, an agent/intermediary, sub-contractor or third party who carries on business in another country, including one which may not have data privacy laws similar to those of the Republic. If this happens, we will ensure that anyone to whom we pass your information agrees to treat your information with the same level of protection as if we were dealing with it.
- 8.3 If you do not wish us to disclose this data to third parties, please contact the Information Officer. We may, however, not be able to provide products or services to you if such disclosure is necessary.

9. Retention of your information

We may retain your personal data, unless you object, in which case we will only retain it if we are permitted or required to do so in terms of Applicable Laws. However, as a general rule, we will retain your data in accordance with retention periods set out in Applicable Laws, unless we need to retain it for longer for a lawful purpose. (For example, for the purposes of complaints handling, legal processes and proceedings.)

10. Access to, correction and deletion of your personal information

- 10.1 You may request details of personal data which we hold about you under the Data Protection Act, 2024 ("DPA"). Fees to obtain a copy or a description of personal data held about you are prescribed in terms of DPA. Confirmation of whether or not we hold personal information about you may be requested free of charge. If you would like to obtain a copy of your personal data held by Bryte, kindly contact us at 363 5000 or your intermediary.
- 10.2 You may request the correction of personal data Bryte holds about you. Please ensure that the data we hold about you is complete, accurate and up to date. If you fail to keep your data updated, or if your data is incorrect, Bryte may limit the products and services offered to you or elect not to open the account.

- 10.3 You have a right in certain circumstances to request the destruction or deletion of and, where applicable, to obtain restriction on the processing of personal data held about you. If you wish to exercise this right, please contact us using the contact details set out above.
- 10.4 You have a right to object on reasonable grounds to the processing of your personal data where the processing is carried out in order to protect our legitimate interests or your legitimate interests, unless the law provides for such processing.

11. Complaints

- 11.1 Should you believe that Bryte has utilised your personal data contrary to Applicable Laws, you undertake first to attempt to resolve any concerns with Bryte.
- 11.2 If you are not satisfied with such process, you may have the right to lodge a complaint with the Data Protection Commission, using the contact details listed below:

Information & Data Protection Commissioner

Ministry for State President

Private Bag 001, Government Enclave, State House Drive, Gaborone, Botswana

Telephone: 395 0800