



# We are confidently, confidential

Keeping our clients data  
secure is our priority



## Privacy Notice

### Who we are

Metropolitan Botswana will maintain the confidentiality of your personal data and comply with the Data Protection Act of 2018 (DPA) when processing your personal data.

This notice applies to Botswana entities within the Momentum Metropolitan Holdings Limited of companies, its subsidiaries, operating divisions, business units, licensed entities, management-controlled entities and activities.

Metropolitan comprises of companies that provide, among others, the following products and services:

- Advisory Services
- Claims Processing
- Claims Administration
- Financial Services
- Health Benefits
- Life Insurance Products
- Investment Products
- Medical Schemes and Pension Fund Administration
- Managed Care Services
- Retirement Products
- Savings Products

### The purpose of the notice

The purpose of this notice is to inform Metropolitan's clients about the type and use of personal data the company collects, the ways in which it is collected, the sharing, protection, and storage thereof.

### What is personal information?

The term 'personal data', as used in this notice, applies to data that may be used to identify an individual.

DPA defines personal data as "Information relating to an identified or identifiable individual, which individual can be identified directly or indirectly, in particular by reference to an identification number, or to one or more factors specific to the individual's physical, physiological, mental, economic, cultural or social identity".

Examples of personal data include, but are not limited to, contact information, financial information, information relating to race, gender, sexual orientation, age, physical or mental health, well-being, disability, religion, conscience, belief, culture, language, and birth of the person.

## What type of personal data does Metropolitan collect?

Personal data collected by Metropolitan can include a data subject's name, contact, birth date, identity number, gender, employment details, marital, family, policy, location information, online identifier, bank account, medical or health information.

When personal data is collected, the company will indicate the purpose for the collection and whether the information required is compulsory or voluntary.

## How does Metropolitan collect personal data?

The company collects information either directly from you, the data subject, the employer or through financial services intermediaries. In certain instances, Metropolitan may appoint third parties to collect information on its behalf. The source from which personal data was obtained, if not directly from the data subject, will be disclosed.

## Use of personal data

After obtaining consent, the personal data collected or held by Metropolitan may be used, stored, transferred, or disclosed or shared for the following purposes:

- Providing quotations, for underwriting and processing insurance applications
- Processing insurance claims
- Providing on-going administration services for the duration of the contract
- Fulfilling a transaction on request of a data subject
- Complying with applicable laws and regulations
- If permission is given, Metropolitan may use your personal or other information to tell you about products, services and special offers from the company or other subsidiaries of Metropolitan

Note: A full list can be obtained in the Public Privacy Policy

## Sharing of personal data

Metropolitan will only share your personal data with third parties if you have consented to such disclosure. If consent has been obtained, the company may share your personal data with persons or organisations within and outside of Metropolitan. If necessary, we will ask the party to whom we transfer your personal information to agree to our privacy principles, associated policies, and practices.

Where Metropolitan discloses personal data to intermediaries, other financial institutions, insurers or any other third parties, the third parties will be obliged to use that personal data only for the reasons and purposes it was disclosed for. Metropolitan may be obliged to disclose your personal data to the extent that it is required to do so by law, in connection with any legal proceedings or prospective legal proceedings, or for the purposes of protecting the interest of clients, for example fraud prevention or to give effect to an agreement.

## Securing personal data

Metropolitan will take all reasonable technical and organisational precautions to prevent the loss, misuse, or alteration of your personal data. The company will store all the personal data in secured environments, for example on secured servers in a protected data centre.

## How you can review and correct your personal data

You can request to review your personal data contained in Metropolitan's records at any time to correct or update the information. If the purpose for which your personal data was requested initially does not exist anymore, for example, you no longer have a contract with it, you may request information held by the company to be removed. However, Metropolitan can decline your request to delete the information from its records if other legislation requires the continued retention thereof or if it has been de-identified.

## Your Rights

We will take note of your rights under applicable privacy and data protection laws, especially your right to object, on reasonable grounds, to certain types of processing.

### Updating of this processing notice

Metropolitan may update this notice periodically and an updated version may be requested, for example through a postal request or through an email notification addressed to the contact details provided below.

### Managing Data Privacy at Metropolitan Board Level and Reporting Frequency

The Metropolitan Board Audit and Actuarial Committee (BAAC) is a sub- committee of the Board that is accountable to address and manage the risk of data privacy and cyber security. The BAAC follows the board cycle and convenes on a quarterly basis. The Metropolitan Chief Risk Officer provides guidance and input regarding appropriate Risk Management.

### Employee Training on Cyber Security and Data Privacy

Employee Training on Cyber Security and Data Privacy forms part of ongoing compliance training. Cyber Security training is currently further required as a basic compliance training that all employees must complete. As part of the DPA management programme, there is a specific focus on training, awareness as well as communication that will cover data privacy, data security and more detailed cyber security training as mandatory compliance training to all staff. The DPA management programme is actively managed at Momentum Metropolitan Group level with participation of all business entities and subsidiaries of Momentum Metropolitan.

### Centralised Cyber Security and Data Security Functions and Coordination

To deal with Cyber Security and Data Privacy, two separate centralised functions exist within Momentum Metropolitan. The IT Security environment includes managing cyber security as a capability and the Data Management environment deals with the aspects of data privacy and extended data security and privacy which is enabled through IT security.

### Metropolitan's Privacy Policy

Our Privacy Policy governs the manner in which Metropolitan treats your personal data, collected electronically when you use our website, to apply online for certain products and services, contact us electronically or register for one of the services we offer on the website.

If you have any questions about this notice or Metropolitan's treatment of your personal data, please address an email to [dataprivacy@metropolitan.co.bw](mailto:dataprivacy@metropolitan.co.bw)