

Customer Privacy Notice



1. Background and purpose of this notice

Protecting customers' personal information is important to First National Bank of Botswana Limited ("FNBB", "we", "our" or "the Bank"). To do so, the Bank follows general principles in accordance with applicable privacy laws.

FNBB collects personal information about its customers which includes what customers tell the Bank about themselves, what the Bank learns by having a customer or when a customer makes use of a product or service, as well as the choices customers make about the marketing they elect to receive. This notice also outlines customers' privacy rights and how the law protects customers.

2. What is personal information?

Personal information refers to any information that identifies a customer or specifically relates to a customer.

3. When does the Bank process customers' personal information?

The Bank may process customers' personal information for lawful purposes relating to its business if the following circumstances apply:

- it is necessary to conclude or perform under a contract the Bank has with the customer or to provide the solution to the customer;
- the law requires or permits it;
- it is required to protect or pursue the customer's, the Bank's or a third party's legitimate interest;
- the customer has consented thereto;
- a person legally authorised by the customer, the law or a court, has consented thereto; or
- the customer is a child, and a competent person (such as a parent or guardian) has consented thereto on their behalf.

4. When will the Bank process customers' special/sensitive personal information?

The Bank may process customers' special personal information in the following circumstances, among others:

- if the processing is needed to create, use or protect a right or obligation in law;
- if the processing is for statistical or research purposes, and all legal conditions are met;
- if the special/sensitive personal information was made public by the customer;
- if the processing is required by law;
- if racial information is processed and the processing is required to identify the customer;
- if health information is processed, and the processing is to determine a customer's insurance risk, or to comply with an insurance policy, or to enforce an insurance right or obligation; or
- if the customer has consented to the processing.

4. When and how will the Bank process the personal information of children?

A child is a person who is defined as a child by a country's legislation, and who has not been recognised as an adult by the courts.

The Bank processes the personal information of children if the law permits this.

The Bank may process the personal information of children if any one or more of the following applies:

- a person with the ability to sign legal agreements has consented to the processing, being the parent or guardian of the child;
- the processing is needed to create, use or protect a right or obligation in law, such as where the child is an heir in a will, a beneficiary of a trust, a beneficiary of an insurance policy or an insured person in terms of an insurance policy;
- the child's personal information was made public by the child, with the consent of a person who can sign legal agreements;
- the processing is for statistical or research purposes and all legal conditions are met;
- where the child is legally old enough to open a Bank account without assistance from their parent or guardian;
- where the child is legally old enough to sign a document as a witness without assistance from their parent or guardian; or
- where the child benefits from a Bank account such as an investment or savings account and a person with the ability to sign legal agreements has consented to the processing.

5. How does the Bank use customers' personal information for marketing?

- The Bank will use customers' personal information to market financial, insurance, investments and other related banking and financial solutions to them (e.g. Bank accounts, insurance policies and credit).
- The Bank may also market non-banking or non-financial solutions to customers (e.g. cellphone contracts and travel offers).
- The Bank will do this in person, by post, telephone, or electronic channels such as SMS, email and fax.
- If a person is not an FNBB customer, or in any other instances where the law requires, the Bank will only market to them by electronic communications with their consent.
- In all cases, a person can request the Bank to stop sending marketing communications to them at any time which is referred to as opting out.

6. When will the Bank use customers' personal information to make automated decisions about them?

An automated decision is made when a customer's personal information is analysed without human intervention in that decision-making process.

The Bank may use a customer's personal information to make an automated decision as allowed by the law. An example of automated decision making is the approval or declining of a credit application when a customer applies for an overdraft or credit card, or the approval or declining of an insurance claim.

Customers have the right to query any such decisions made, and the Bank will provide reasons for the decisions as far as reasonably possible.

7. Customers' duties and rights regarding the personal information the Bank has about them

Customers must provide the Bank with proof of identity when enforcing the rights below:

- a. Right to access
- b. Right to correction, deletion or destruction
- c. Right to objection
- d. Right to withdraw consent
- e. Right to complain

Customers must inform the Bank when their personal information changes, as soon as possible after the change.

Customers warrant that when they provide the Bank with personal information of their spouse, dependents or any other person, they have permission from them to share their personal information with the Bank. The Bank will process the personal information of the customer's spouse, dependent or any other person which the customer has shared with it as stated in this notice.

8. How the Bank secures customers' personal information

The Bank will take appropriate and reasonable technical and organisational steps to protect customers' personal information in line with industry best practices. The Bank's security measures, including physical, technological and procedural safeguards, will be appropriate and reasonable.

This includes the following:

- keeping Bank systems secure (such as monitoring access and usage);
- storing Bank records securely;
- controlling access to Bank premises, systems and/or records; and
- safely destroying or deleting records.

Customers can also protect their own personal information and can obtain more information in this regard by visiting the website of the relevant Bank business that they have established a business relationship with.

9. How long does the Bank keep customers' personal information?

The Bank will keep customers' personal information for as long as:

- the law requires the Bank to keep it;
- a contract between the customer and the Bank requires FNBB keep it;
- the customer has consented to the Bank keeping it;
- the Bank is required to keep it to achieve the purposes listed in this notice;
- the Bank requires it for statistical or research purposes;
- a code of conduct requires the Bank to keep it; and/or
- the Bank requires it for lawful business purposes.

TAKE NOTE: The Bank may keep customers' personal information even if they no longer have a relationship with the Bank or if they request the Bank to delete or destroy it if the law permits or requires.