



HOLLARD BOTSWANA

**PERSONAL INFORMATION ACCESS
PROCEDURES**

2024

1.0 Introduction

This document outlines the procedures for individuals to access, amend, and request the erasure of their personal data held by Hollard. These procedures are designed in compliance with the Data Protection Act, 2024 and as amended from time to time. These procedures are established to uphold individual rights regarding personal data as outlined in GDPR, ensuring that all access, erasure, and amendment requests are handled efficiently and respectfully.

For further inquiries regarding personal data, please contact the Data protection Officer (DPO) at dataprivacy@hollard.co.bw.

2.0 Types of Requests

2.1 Requesting Access to Personal Data

Data subjects can approach Hollard, request access to their personal data and confirmation of the following factors;

- a) The purpose of processing;
- b) The categories of personal data concerned;
- c) The recipient or categories of recipients to whom the personal data has been or will be disclosed, and in particular recipients in third countries or international organisations;
- d) The envisaged period for which the personal data will be stored, or if not possible the criteria used to determine the period;
- e) The source of information, where the personal data is not collected from the data subject;

- f) The existence of automated decision-making, including profiling and meaningful information about the logic involved as well as the significance and the envisaged consequences of such processing for the data subject.

2.2 Request for Erasure of Personal Data

A data subject may request the erasure of their personal data if:

- a) The personal data is no longer necessary for the purpose for which it was collected.
- b) Consent is withdrawn, and there are no other legal grounds for processing.
- c) The individual objects to the processing of their personal data.

2.3 Request for Amendment of Personal Data

To request an amendment of personal data, individuals must specify the inaccuracies notated in their personal data and Indicate the correct and accurate data.

3.0 How to lodge a request

Individuals can lodge a request of any nature relating to their Personal Information using the following means:

- a) In writing, via email to dataprivacy@hollard.co.bw
- b) Submitting the request to the Hollard Customer Service Centre

The request must include:

- a) Full name
- b) Contact information (email, phone number)

- c) Details of the personal data being requested (e.g., policy number, dates)
- d) Any additional information to help identify the data (e.g., previous addresses)

4.0 Response Mode and Timeframe

Hollard commits to respond to the request within one month from the date of receipt. If the request is complex or multiple requests are made, this period may be extended by two additional months. The Data Subject shall be notified of the extension and the reason for it within the first month of receipt of the request.

Where the data subject has made the request using an electronic form, the response shall also be in electronic form unless they had specified an alternative mode of response.

Possible reasons for refusal to act on the act maybe:

- a) Where the request is manifestly unfounded or excessive, because of their repetitive character
- b) Where Hollard is able to demonstrate that it is not in a position to identify the data subject

Where Hollard has not taken any action on the request, the Data subject must be informed on the reasons for not taking action and their right to lodge a complaint with the commissioner.

5.0 Fees

Hollard shall receive, process and respond to Data Subjects requests relating to their personal data without any charge.

6.0 Complaints Procedures

Individuals who believe that their data rights are not being honoured may submit a complaint by:

- Sending a written complaint to the Data Protection Officer (DPO) at dataprivacy@hollard.co.bw

7.0 Processing of Complaints

Complaints will be acknowledged within 5 business days and investigated thoroughly. The individual will receive a response within 30 days.

8.0 Escalation of Complaints

If the complaint is unresolved, individuals have the right to lodge a complaint with the commissioner at:

The Information and Data Protection Commission:

Ministry for State President

267 395 0998