



Hollard Privacy Statement

This Privacy Policy applies to information collected on the Hollard website, referred to herein as the “Website” and anywhere else this Privacy Policy is posted. It also applies to information collected through our digital platforms, our services, and our events and workshops (collectively referred to as our “Services”).

Please read this Privacy Notice carefully. By accessing our websites or using our services, you agree to the collection, storage, and processing of your information in accordance with this Privacy Policy. This Privacy Notice may be updated periodically in response to regulatory requirements, so please check this page regularly for any changes to our Privacy Policy.

At Hollard, we prioritize the protection of your personal information. In this document, personal information refers to any information specific to you that is provided to Hollard.

This notice explains how we collect, use, and share your personal information. It aims to inform you of your rights and how to exercise them in accordance with the Data Protection Act (DPA) and other relevant laws.

1. Who is Hollard?

In this notice, the term "Hollard" refers to the following entities:

- a. Hollard Holdings Botswana (UIN: BW00000877214) - the holding company for the Botswana Hollard Group.
- b. Hollard Insurance Company of Botswana (UIN: BW0000444578) - a general insurance company that is licensed and regulated by the Non-Bank Financial Institutions Regulatory Authority, operating in Botswana.
- c. Hollard Life Assurance Company of Botswana (UIN: BW00000415081) - a life insurance company that is licensed and regulated by the Non-Bank Financial Institutions Regulatory Authority, operating in Botswana.
- d. Claims Assessment Centre (UIN: BW00001877802) - a subsidiary of Hollard Holdings.

2. What information we collect

Your relationship with Hollard defines the specific personal data that Hollard processes, as well as the purposes for which this data is collected and used. However, in most instances, when we are handling your data in our capacity as an insurer, the personal data we may process typically includes the following:



- a. Personal Information – This includes details such as your name, identity number, age, gender, date of birth, nationality, occupation, health information, and address. If you submit a claim, we may collect additional personal data related to that claim and any relevant third parties. We recognize that health information is considered sensitive personal data and will handle it according to applicable laws and for the purposes of insurance. This includes assessing the terms of your insurance contract, managing changes to your policy, and processing claims.
- b. Contact Information – This refers to the details we use to communicate with you, such as your email address, physical address, phone number, and postal address.
- c. Online Information – This includes data such as cookies and your IP address (your computer’s internet address) when you use our websites, apps, or social media channels.
- d. Financial Information – We may process information relating to payments you make or receive in the context of an insurance policy or claim. This also includes details about your income, expenses, assets, liabilities, and other financial aspects relevant to the services we provide.
- e. Contractual Information – This encompasses information about the insurance policies you hold and the institutions with which you have these policies.

3. You have the right to refuse to provide us with your personal data. However, if you do so, we may not be able to offer you the relevant services or may need to end our business relationship. Please note that supplying certain types of personal data, particularly those required to comply with regulations, is legally mandatory.

4. Where we collect information

We collect and process your data to deliver our services, enhance our offerings, and for specific purposes outlined below.

When you provide us with information about third parties, such as your spouse, beneficiaries, or dependents, we will process their personal information to issue a policy or benefit and to serve their legitimate interests. Additionally, we will process personal information for the purposes outlined in this Notice.

You guarantee that the personal data you provide about third parties is accurate and that you have obtained their permission to share this data with us, as outlined in this Privacy Policy or for any related purposes. If you are providing consent for someone under the age



of 18 (a minor), you confirm that you are legally competent and have the authority to give consent on their behalf.

- We will only collect information that we need for the specific purpose and the types of information we collect will depend on the purpose for which it is collected and used.
- We collect information directly from you when you complete a service application form electronically.
- We collect information indirectly when you interact with us electronically through our website, apps, or social media channels. This may include metadata collection. For example, we may gather website usage information through "cookies," which allow us to track standard internet visitor behaviour. This includes details about how you accessed our website, such as your IP address, information about your visit, your device information, and how you use our site. We may also capture your approximate location information.
- Additionally, we will collect your information if you have only partially completed and/or abandoned any application on our website or other online forms.
- We collect various types of information about you from other sources, including criminal, credit, and medical information. This is done for the following purposes:
 - Third-Party Sources: We obtain information from third-party organizations such as credit reference agencies, fraud prevention agencies, and law enforcement agencies for the purposes outlined in [Section 7](#).
 - Hollard Group Companies: We may share information with other companies within the Hollard Group as described in [Section 9](#), particularly when we believe it would enhance the services we offer you.
 - This sharing occurs only if you have not objected to it. By supplementing the information you provide with data from other Hollard Group companies, we aim to deliver a more consistent and personalized experience during your interactions with us and to ensure that we maintain updated information about you.
- Additionally, we may collect your personal details if one of our employees provides your contact information as an emergency contact or as a referee.

We are committed to taking all reasonable steps to ensure that your personal information is complete, accurate, not misleading, and kept up to date regularly.



5. Collection of information by Third Parties

Administrators of third-party websites that link to the Hollard website may collect personal data about you when you use these links. Hollard does not control the collection or use of personal data by these third parties, and this Privacy Notice does not apply to them. Hollard is not responsible for the policies of third parties or your use of any third-party app, platform, or service.

Hollard utilizes various social networking services, including Facebook, LinkedIn, WhatsApp, Instagram, and X, to connect with the public and clients. When you interact with Hollard through these platforms, the respective social networking service may collect your data for its own purposes.

These services may monitor your usage of our digital channels on the pages where the links are displayed. If you are logged into any of these services (including Google services) while using our digital channels, their tracking will link your profile to those service providers. Please note that these services have their own privacy policies, which operate independently of Hollard's privacy policies and practices. We encourage you to familiarize yourself with the terms of these third-party privacy policies and practices.

6. How we use the information collected

Hollard will only collect the information that we need for specific purposes. We use, store, and process the information collected for the following reasons:

- a. To identify you.
- b. To provide you with our financial products and services.
- c. To offer you financial advice.
- d. To maintain our relationship with you.
- e. To conclude and manage your application, which may include underwriting.
- f. To execute transactions according to your requests.
- g. To assess, verify, and process your claims.
- h. To communicate with you about your policy, updates, and important notices.
- i. To fulfill our contractual obligations with you or take necessary steps for concluding a contract.
- j. To comply with legislative and regulatory requirements, including codes of conduct and the demands of our regulators.



- k. To conduct credit reference searches and/or verifications, where applicable.
- l. To detect and prevent unlawful activities, fraud, money laundering, and losses, including due diligence as required by applicable laws and Hollard policies.
- m. For debt recovery or tracing.
- n. For online login and authorization purposes.
- o. For statistical analysis and research.
- p. For audit and record-keeping purposes.
- q. For legal proof and proceedings.
- r. Subject to the necessary consent, to reach out to you and offer opportunities to take up some of our financial products, enhancing your experience and fulfilling your needs, provided that you have not opted out of receiving such marketing materials.
- s. To conduct market research and provide you with information about our products and services from time to time via email, telephone, or other means (for example, by inviting you to events).
- t. To manage your marketing preferences (if you have unsubscribed from certain direct marketing communications, we will keep a record of your request to ensure that we do not send such communications to you again).
- u. For any other purpose related to or compatible with the above, or as communicated by us from time to time.

When you provide us with information about third parties, such as your spouse, beneficiaries, or dependents, we will process their personal information to provide services and to pursue their legitimate interests.

7. Who we disclose the information to

Hollard will only share your data with third parties for legitimate reasons. We may disclose the personal data you provide to the following entities:

- a. We may share your information with third-party service providers and other entities within the Hollard Group that are involved in delivering or administering financial advice services.
- b. Your information may also be shared with other third parties for the purposes outlined in the previous section ([How We Use Your Information](#)).



- c. We may disclose information to public bodies and law enforcement agencies, either directly or through shared databases, for the purposes of fraud detection and prevention.
- d. Reinsurers that provide reinsurance services to Hollard will use your data to determine whether to offer reinsurance coverage, assess and handle reinsurance claims, and fulfill any legal obligations.
- e. As a public entity, we are subject to audits and may share your information with auditors. The information shared will depend on the nature and scope of the audit, and we will take measures to minimize data sharing whenever possible.
- f. Hollard will not sell, rent, or trade your data to any third party. However, we may share information about you with financial advisers who are our representatives or have intermediary agreements with Hollard.
- g. Hollard will disclose information when it is legally required to do so in the following situations:
 - i. To comply with any relevant legislation.
 - ii. To comply with any legal processes.
 - iii. When required by regulatory authorities, such as the Non-Bank Financial Institutions Regulatory Authority.

Occasionally, Hollard may share aggregated information with its stakeholders and business partners for legitimate purposes, such as demographic data. This will be done in a way that does not identify specific individuals. However, Hollard will not disclose your personal data to third parties unless there are legitimate grounds to do so, as outlined in the Data Protection Act.

8. When do we transfer your information to Third Parties

- a. Hollard will not share your information with any third parties for direct marketing purposes.
- b. a. If Hollard uses third-party information processors, they will handle your information in accordance with our contractual agreement. This means that they:
 - i. Have a legal obligation to act only as instructed and are not permitted to use your personal information for any other purpose;
 - ii. Are prohibited from sharing your personal information with any organization other than us; and

- iii. Must protect and secure your information and retain it only for the duration we specify.

9. When do we transfer your information across borders

We may transfer your data to service providers outside of Botswana for storage or processing on behalf of Hollard. However, we will not send your information to a country that lacks equivalent data protection laws to those in Botswana, unless this transfer complies with the Data Protection Act.

Hollard is a member of the Hollard International Group, and as such, we may share your personal information with our group and subsidiary entities located outside the Republic of Botswana.

Before transferring personal data to third countries, Hollard will ensure that adequate security measures are in place.

10. How we protect and safeguard your information

Hollard values the data you provide to us, and we are committed to taking reasonable steps to protect your personal information from loss, misuse, or unauthorized alteration.

We have implemented appropriate technical and organizational security measures, including encryption, to ensure that your information remains secure, accurate, current, and complete. Our security policies and procedures cover:

- a. Physical Security
- b. Computer and Network Security
- c. Access to Personal Information
- d. Secure Communications
- e. Security in Contracting Out Activities or Functions.
- f. Retention and Disposal of Information
- g. Acceptable Use of Personal Information
- h. Governance and Regulatory Issues
- i. Monitoring Access and Usage of Personal Information
- j. Investigating and Responding to Security Incidents



Where third parties are required to process your data for the purposes outlined in this policy and for other lawful reasons, we ensure that they are contractually obligated to apply appropriate security practices.

We store your information in databases that are equipped with built-in safeguards to protect the privacy and confidentiality of that information.

Please note that Hollard cannot guarantee the security of any personal information you disclose online. When you use our online services, you will receive a username and password. It is crucial that you keep this information confidential and do not share it with anyone.

Whenever you use this website, complete a quotation or application form, or contact us electronically, we will process and collect your personal information.

11. Your rights to access and correction and deletion of information

You have the right to access any personal data that Hollard holds, processes, and stores about you, following the procedures outlined in [Hollard's Personal Information Access Procedures](#).

If any of the data we store or process about you is inaccurate or incomplete, you have the right to request an update, in accordance with the same procedures. You will not be charged for exercising your rights.

In some cases, we may require your consent to process your data. If you provide consent for a specific purpose, you can withdraw that consent at any time. Please be aware that withdrawing your consent will not impact any processing that occurred before the withdrawal; however, it may affect our ability to provide you with some or all of our services. The following are your rights as a data subject.

Your rights regarding personal data:

- a. **Right of Access:** You have the right to request copies of your personal information. This right is always applicable, although there are some exceptions that may prevent you from receiving all the information we process.
- b. **Right to Rectification:** You have the right to request corrections to any information you believe is inaccurate. Additionally, you can ask us to complete any information you think is incomplete. This right is always applicable.
- c. **Right to Erasure:** You have the right to request the deletion of your personal information under certain circumstances.
- d. **Right to Restrict Processing:** You have the right to request a restriction on the processing of your information in specific situations.

- e. **Right to Object to Processing:** You have the right to object to the processing of your personal data.
- f. **Right to Data Portability:** This right applies only to the information you have provided to us. You have the right to request that we transfer that information from one organization to another or provide it to you directly. This right is applicable only if we are processing your information based on your consent or during negotiations regarding a contract, and if the processing is automated.

12. Click Stream Data

Hollard may collect anonymous information from visitors to this website to enhance customer service. This information is designed to be unidentifiable. It is sometimes referred to as "clickstream data." Hollard, along with its analytics partners (including Google Analytics), may use this data to analyse trends and statistics, ultimately improving customer service.

The information collected, referred to as traffic data, includes the following:

- a. Your IP address.
- b. The search terms you have used.
- c. The pages you accessed on the website and the links you clicked on.
- d. The date and time of your visit to the website.
- e. The referring website (if any) through which you arrived at our site.
- f. The type of web browser you are using.

Hollard aggregates this traffic data, which is not personally identifiable. Our website analysis is required to respect any 'do not track' settings you may have enabled in your web browser.

13. Marketing

When you provide your data to Hollard while purchasing one of our products or services, you agree to receive information about news, trends, services, events, and promotions related to our similar products or services. You can opt out of receiving such marketing communications at the time your information is collected and in each subsequent marketing communication.

If you wish to stop receiving direct marketing from Hollard, you can do so at any time by contacting us at dataprotection@hollard.co.bw. Please allow up to 30 days for us to process your request and remove you from our marketing list.

14. Cookies

a. What is a cookie?

A cookie is a small text file that gets downloaded onto your device, such as a computer or smartphone, when you visit a website. It enables the website to recognize your device and store information about your preferences or past activities.

b. What cookies do we use?

- i. Some cookies we use are essential for the proper functioning of our website. Other cookies improve the performance and design of our site, allowing us to track how many times a page has been visited and whether it was accessed through an advertisement or other means. Additional cookies help us remember your selected settings and assist with various functionalities as you browse our website. This enables us to recall your preferences during your return visits.
- ii. On certain pages of our website, we use cookies to better understand your interests as you browse the internet. This helps us provide you with more personalized content and services in the future. Additionally, it allows us to deliver relevant advertising during various campaigns we may run through participating third-party sites.
- iii. We also use cookies on certain pages of our website to communicate with third-party data suppliers. This allows us to analyse your digital behaviour, helping us to understand and deliver more relevant advertising in the future. The information we gather is aggregated and anonymous, and it includes statistics such as demographics, online behaviour, product interests, and lifestyle.

c. How do you disable cookies?

If you prefer not to receive cookies from the website, you can adjust your browser settings to notify you whenever a cookie is sent. This way, you can decide whether to accept it or not. However, keep in mind that disabling cookies in your browser may prevent you from fully experiencing certain features of the website. For instance, you will not have access to automatic log-in and other personalization options.

15. Collection of Minor's information



Hollard is dedicated to complying with all applicable laws aimed at protecting children, particularly regarding the safeguarding of their data. Any data collected by Hollard concerning minors will be processed in accordance with the Data Protection Act.

If you are providing consent for someone under the age of 18 (a minor), you confirm that you are authorized to give consent on their behalf.

16. Policy updates

This Privacy Notice was last updated on February 7, 2025. We will post a notification on the Hollard website's homepage whenever there are significant changes to this Privacy Notice. Please check the website regularly to stay informed about the latest version.

17. Questions regarding this notice

For any questions, comments, or requests related to this notice, please direct them to dataprotection@hollard.co.bw for clarification.

18. Consent to this policy

Hollard reserves the right to amend this Privacy Policy at our sole discretion. You agree to review the terms of this Privacy Policy each time you visit our website for any changes. This Privacy Policy will be governed by and interpreted according to the laws of the Data Protection Act and other applicable laws of the Republic of Botswana.

When you visit our website, offices, or distribution partners to inquire about or obtain Hollard services, and you provide us with your personal information, you are agreeing to the provisions outlined above.

19. The Data Protection Commission

We welcome the chance to discuss any concerns you may have about our handling of your personal data. However, you also have the right to file a complaint regarding the collection, use, processing, or storage of your personal data with the Data Protection Commissioner. Here are their contact details:

- The Information and Data Protection Commission:

Ministry of State President
Private Bag 001
Gaborone
[+267 395 0998](tel:+2673950998)

Hollard.