



## PRIVACY NOTICE TO DATA SUBJECTS

At P&C Re, we value your privacy and we are committed to safeguarding your personal data. We take your privacy seriously. We value your contribution to our success, and we will do everything we can to protect your individual rights and personal liberties. As part of our ongoing relationship, we will need to collect, store and process certain information about you. This information is required to carry out certain processes, and we will clearly explain what those processes are and how your data will be used. You have the right to object to the processing of your data at any time. This privacy policy shall be occasionally updated in-line with company policy and regulatory updates. Any updates to this policy will be communicated to all our data subjects as soon as possible.

P & C Reinsurance Proprietary (Ltd) is a Botswana registered and licenced reinsurance Company by the Non-Bank Financial Institutions Regulatory Authority, required to comply with the Data Protection Act 2024. Below is our contact details:

### 1. Contact Information:

- **Address:** Plot 50688, Unit 1B, RDC Mpingo Building, Fairgrounds, Gaborone – Botswana
- **Email:** [www.operations@pcre.co.bw](mailto:www.operations@pcre.co.bw)
- **Phone:** +267 3631013

### 2. Type of Personal Data Collected

We may collect the following categories of personal data for the sole purpose of reinsurance services throughout the supply chain:

- **Contact Information:** address, email address, phone number  
**Financial Information:** Bank details, payment information, billing history, financial statements, tax certificates.
- **Identity details:** such as your name, id or passport number, date of birth and gender.
- **Driving and insurance details:** Driving licence information, previous insurance policy details, previous accident and claim history, details of any motoring convictions.
- **Audio, video, and other electronic data:** audio, electronic, visual, or similar information such as, photographs, and call/ Microsoft teams recordings.



- **Sensitive information and data relating to criminal records and offences:** such as health information and some background checking information (i.e. alleged criminal offences and records).

### 3. Method of Data Collection:

Your personal data will be collected through:

- Emails,
- Filling of forms and
- Any other communication channels like phone calls which are later confirmed in writing.

### 4. Purpose of Data Use:

We may use your personal data for the following purposes:

- Offer, administer and manage the Services provided to you including assessing, underwriting insurance policies, reinsurance processing.
- Administer, investigate, and settle claims or complaints in relation to insurance policies and/ or the Services provided.
- Communicate with you and to respond to your requests, inquiries, comments, and concerns.
- Carry out due diligence, identity, data validation, anti-money laundering, "Know Your Customer" and other business acceptance, vetting and risk management checks.
- Process payments, including your payments for the insurance premium and any mid-term adjustments.
- Fulfil legal and regulatory obligations, including applicable prudential rules and industry codes of conduct.
- Perform analytics for risk modelling purposes and to analyse trends; and
- Research, audit, reporting, and other business operations purposes,

### 5. Legal Basis for Processing Personal Data

We will use the information we collect about you in connection with the Services and for any such use, we rely on an appropriate legal ground. Where processing involves sensitive personal information, we also rely on an additional legal justification to use such information.



- **Performance of the contract with you to enable us to take steps in offering the services and fulfil our obligations.**
- **To meet our legal and regulatory obligations,** as P & C Re is regulated by certain industry regulators and is required to provide some Services in accordance with relevant regulatory rules, such as financial and prudential regulations, tax rules, obligations to prevent and detect unlawful activities, among others.
- **Your Consent:** You may also provide us with your consent to receive certain Services, marketing, or communications from us (where legally required). In such situations, you are not obliged to provide your consent, and you may choose to subsequently withdraw consent at any stage once provided. However, where you refuse to provide information that we reasonably require to provide the Services, we may be unable to offer you the Services and/or we may terminate the Services if not possible to fulfil the Services without the respective information.

## 6. Recipients of your information

P & C Re may from time to time share your personal information with the following categories of recipients where necessary to offer, administer and manage the Services provided to you.

- **Within P & C Re,** we may share your personal information with other entities, divisions, and subsidiaries for the processing purposes outlined in this Statement.
- **Insurance market participants:** where necessary to offer, administer and manage the Services provided to you, such as insurers underwriters, reinsurers, Associations of Insurance Underwriters, brokers, intermediaries, assessors, claim investigators, loss adjusters and legal advisors where necessary to defend legal claims, insurance claims or claims similar in nature.
- **Internal and external auditors:** where necessary for the conduct of company audits or to investigate a complaint or security threat.
- **Law enforcement bodies:** where necessary to facilitate the prevention or detection of crime or the apprehension or prosecution of offenders.
- **Public authorities, regulators, and government bodies:** where necessary for P & C Re to comply with our legal and regulatory obligations.



- **Third party service providers:** where we outsource our processing operations to suppliers that process personal information on our behalf. These processing operations shall remain under our control and will be carried out in accordance with our security standards and strict instructions.

## **7. Third country/ International Organisation transfers**

P & C Re may transfer your personal information to other countries for further processing for the purposes outlined in this Statement. We endeavour to ensure that such transfers comply with all applicable data privacy laws and provide appropriate protection for the rights and freedoms conferred to individuals under such laws.

This may include transfers to countries that the Information and Data Protection Commission consider providing adequate data privacy safeguards.

Where we transfer personal information to countries that are not subject to an adequacy decision we shall put in place appropriate safeguards, approved by the Commission covered through data transfer agreements which contain standard contractual clauses to ensure that personal information receives an appropriate and consistent level of protection across the entities.

## **8. Direct Marketing**

P & C Re may send you information about its products and other services and/or products to your contacts shared with us, which may include text messages, emails, and other related platforms. If you do not wish to receive such information, you have the right to opt out of receiving such messages at no cost to you by contacting our offices.

## **9. Data Security**

The security of your personal information is important to us, and we have implemented appropriate technical and organizational security measures to protect the confidentiality, integrity and availability of your personal information from unauthorised access, alteration, disclosure, or destruction, to ensure that such information is processed in accordance with applicable data privacy laws.

## **10. Data Retention**

We retain appropriate records of your personal information for as long as is reasonably necessary for the purposes outlined in this statement and compliance with our legal and regulatory obligations on how long to such data is required to be retained.



Where it is no longer required for the outlined purposes, we undertake to securely dispose it in a timely and consistent manner or pseudonymise it.

## 11. Data subject request rights

- **Right to access** and request a copy of your personal data.
- Right to request **rectification** where accuracy is disputed.
- Request the **erasure** of your personal information where erasure is subject to legal or statutory obligations to which we are subject.
- **Right to object to the processing** of your personal data under certain circumstances
- **Right to withdraw consent given** for the processing of personal data at any time.
- Right to request that your personal information be provided to you or a third party of your choice in **portable** form to enable its reuse. That is, in a structured, commonly used, and machine-readable format transmittable to another data controller without hindrance. Provided that the processing is based on consent or contract, carried out by automated means, and where technically feasible, directly transmittable.

Please note, the above rights are subject to legal and regulatory requirements. If you wish to exercise any of these rights, please contact our designated Data Protection Officer or the assigned contact person for P & C Re on the below mentioned contact details.

## 12. Changes to This Privacy Notice

We may update this Privacy Notice from time to time. Any changes will be communicated to you, and the updated notice will be posted on our website. For any enquiries kindly refer to our below contact details:

### Data Representative Information for P & C Reinsurance Company

**Contact Person:** Gosego Sadie Letlhage

**Email Address:** [gletlhage@pcrc.co.bw](mailto:gletlhage@pcrc.co.bw)

**Phone number:** +267 3631013.

### Appointed Data Protection Officer

**Data Protection officer:** Ms Aobakwe Kwape

**Email info:** [aobakwe.kwape@bstiua.co.bw](mailto:aobakwe.kwape@bstiua.co.bw)

**Contact number:** 73886606/ 74434273

**Postal Address:** P O BOX 715, Gaborone

After engaging us, should your complaint not be addressed to your satisfaction, you have the right to lodge a complaint with the Information and Data Protection Commission.