

PRIVACY NOTICE FOR SUPPLIER REPRESENTATIVES, DIRECTORS AND SHAREHOLDERS

The Data Protection Act requires the Debswana Pension Fund ("Fund," "we," "our," or "us") to handle personal data transparently and responsibly. This Privacy Notice outlines how we collect and use the personal data of supplier representatives, directors and shareholders, who we share the personal data with, and your rights regarding your personal data.

If you have any questions about this Privacy Notice, please contact us using the details provided below.

WHAT PERSONAL DATA DO WE COLLECT/ HOLD?

We may collect and process the following types of personal data:

1. Supplier representatives: full name, email address, phone number, and your position or designation within the supplier organisation.
2. Directors and shareholders (where applicable): full names, copies of identity documents, proof of residential address and proof of source of income.

FROM WHOM DO WE COLLECT YOUR PERSONAL DATA?

We collect personal data directly from the supplier representative through onboarding forms or other communications and supporting documentation submitted during the onboarding process including identification documents, proof of residential address and proof of source of income.

HOW WILL WE USE YOUR PERSONAL DATA?

Your data is collected and processed for the following purposes:

1. verifying the identity and role of the supplier representatives within the supplier organisation;
2. verifying the identity of the directors and shareholders;
3. communicating with the supplier representatives regarding supplier-related matters;
4. conducting due diligence including anti-money laundering (AML) and Know Your Customer (KYC) checks to fulfil legal obligations under the Financial Intelligence Act; and
5. managing our supplier database and maintaining accurate records of the supplier details and their associated individuals.

WHAT LEGAL BASIS DO WE RELY ON TO USE YOUR PERSONAL DATA?

The processing of your personal data is based on the following legal grounds:

1. compliance with legal obligations under the Financial Intelligence Act including anti-money laundering (AML) and know your customer (KYC) processes; and
2. legitimate interests such as effective supplier relationship management and communication and ensuring proper governance and risk management in supplier relationships.

ORGANISATIONS THAT WE MAY SHARE YOUR PERSONAL DATA WITH

We take the protection of your personal data seriously and share it only when necessary. We may share your personal data with the following organisations:

1. regulatory bodies or law enforcement agencies, as required by law; and
2. third-party service providers assisting with supplier management.

TRANSFERRING YOUR PERSONAL DATA OUTSIDE BOTSWANA

Your personal data may be transferred outside Botswana to jurisdictions that may not have equivalent data protection standards. In such cases, we will ensure appropriate safeguards are implemented, including:

1. adequacy decisions - where the receiving country has been recognised by the Information and Data Protection Commission as providing an adequate level of data protection;
2. appropriate safeguards - use of legally binding agreements, including standard contractual clauses or data transfer agreements, to ensure your data remains protected; or
3. derogations for specific situations - in limited cases, we may transfer data based on your explicit consent, to fulfil contractual obligations, or to protect your vital interests or those of another person.

We remain committed to ensuring the protection of your data during international transfers in compliance with the Data Protection Act.

YOUR RIGHTS

1. You have the right to request information on how we process your data, including the purposes of processing and the categories of data involved as well as a copy of the personal data we hold about you.
2. If your personal data is inaccurate or incomplete, you have the right to request its correction or update.
3. You can ask us to restrict processing of your personal data in certain circumstances, such as when you contest the accuracy of the data, when the processing is unlawful, but you prefer restriction over deletion and when the data is no longer needed for processing, but you require it for legal claims.
4. You can object to the processing of your personal data where the processing is based on legitimate interests;
5. You can request the deletion of your personal data when the data is no longer needed for the purposes it was collected, when you withdraw your consent, and no other legal basis for processing exists or when the processing is unlawful.
6. You have the right to receive your personal data in a structured, commonly used, and machine-readable format and to transfer it to another organisation.
7. You also have the right to lodge a complaint with the Information and Data Protection Commission.

To exercise your rights, contact us as outlined below. Additional information may be required to process your request.

CONTACTING US

For any questions, concerns or to exercise your rights, contact the Fund:

Telephone: 3614288
Email: dpfdataprotection@debswana.bw
Address: Private Bag 00512 Gaborone

UPDATES TO THIS PRIVACY NOTICE

This Privacy Notice may be updated periodically to reflect changes in legal, regulatory, or operational requirements. We will inform you of any updates and the date they take effect.