

## **BANK OF BARODA (BOTSWANA) LIMITED CUSTOMER PRIVACY NOTICE**

Bank of Baroda (Botswana) Limited (“we,” “us,” or “our”) is committed to safeguarding your personal data. This Privacy Notice explains how we collect, use, share, and protect your personal information in compliance with applicable data protection laws, including the Data Protection Act (DPA), to ensure transparency and trust in our services.

### **1. PERSONAL DATA WE COLLECT**

We collect a range of personal data to provide our banking services. This may include:

- a. **Identification Data:** Name, date of birth, government-issued Identity document (e.g., passport, driver's license), tax identification number, nationality.
- b. **Contact Information:** Residential and postal address, phone number, email address.
- c. **Financial Information:** Bank account details, transaction history, credit and debit card numbers, loan and credit information, income, assets, and liabilities.
- d. **Employment Information:** Job title, employer, salary details for certain products or services.
- e. **Transactional Data:** Records of your transactions, payments, and account activity.
- f. **Digital Data:** IP address, browser type, and online behaviour if you access our online banking services.
- g. **Customer Service Data:** Communications with customer service and records of inquiries or complaints.

### **2. SOURCES OF PERSONAL DATA**

We collect most of the personal data directly from you. You give us this personal data when you complete the various application forms you are given to populate for any product or service solicited from us such as the loan application forms, or electronically (email), telephonically, online ([www.bankofbaroda.co.bw](http://www.bankofbaroda.co.bw)) or via the Bank of Baroda Banking Apps. Some of your personal data is collected indirectly from other organisations (such as credit rating agencies), through a contact person of a company or any juristic person and through video surveillance by CCTV when you visit our branches and offices.

### 3. HOW WE USE YOUR PERSONAL DATA

We use personal data for various purposes essential to providing secure and efficient banking services, including:

- a. **Account management:** To open, maintain, and manage your accounts, including processing transactions and conducting security checks.
- b. **Banking and financial services:** To process transactions and providing banking services
- c. **Loan and credit assessment:** To assess eligibility for loans, credit, and other banking products, as well as monitor and manage credit risk.
- d. **Customer support:** To provide assistance, respond to inquiries, and manage complaints.
- e. **Fraud prevention and security:** To monitor accounts for suspicious activity, prevent fraud, and ensure security.
- f. **Regulatory compliance:** To comply with legal and regulatory requirements, including anti-money laundering (AML), counter-terrorism financing, and "Know Your Customer" (KYC) obligations.
- g. **Marketing and product development:** To offer personalized product recommendations, and if you consent, send you marketing information on products or services.
- h. **Internal analysis:** To analyse customer usage patterns, improve services, and develop new products.

### 4. LEGAL BASIS FOR PROCESSING YOUR PERSONAL DATA

We process personal data based on one or more of the following legal grounds:

- a. **Contractual necessity (Performance of a contract):** To provide banking services and fulfil our contractual obligations to you.
- b. **Compliance with a legal obligation:** To comply with banking and financial regulations, AML, KYC, tax reporting, and other legal requirements.
- c. **Legitimate interests pursued by the Bank:** To protect our business interests, such as

improving security, fraud prevention, and understanding customer needs. We ensure that this does not override your privacy rights.

- d. **Consent of the data subject:** For specific purposes such as marketing, if you have explicitly consented.

## 5. DATA SHARING AND DISCLOSURE

We do not always have to share your personal data, however we may share your personal data with the following parties:

- a. **Credit reference and fraud prevention agencies:** For credit assessments such as Credit Bureaus and to protect against fraud and financial crimes.
- b. **Government authorities:** tax authorities, regulatory or industry bodies, law enforcement and other governmental entities to comply with legal obligations;
- c. **Service providers:** Third-party vendors/service providers engaged by us to deliver services and support the promotion of our products, ensuring alignment with our business objectives and customer interests.

## 6. YOUR RIGHTS

You have certain rights regarding your personal data, which may include:

- a. **Access:** Request a copy of the personal data we hold about you.
- b. **Rectification:** Request correction of incorrect or incomplete data.
- c. **Deletion:** Request deletion of personal data in certain situations.
- d. **Restriction:** Request restriction of processing under specific circumstances.
- e. **Portability:** Request your personal data in a structured, machine-readable format.
- f. **Objection:** Object to the processing of personal data based on legitimate interests or to receiving direct marketing.
- g. **Withdraw Consent:** Withdraw your consent for processing based on consent.

To exercise these rights, please contact our DPO at +267 3992706.

## 7. **HOW THE BANK SECURES YOUR PERSONAL DATA**

We implement robust technical and organisational security measures in line with industry best practices to protect your data against unauthorized access, alteration, disclosure, or destruction. This measures includes the following:

- a. keeping Bank systems secure (such as monitoring access and usage);
- b. storing Bank records securely,
- c. controlling access to Bank premises, systems and/or records;
- d. encryption; and
- e. regular security audits.

## 8. **HOW LONG DOES THE BANK KEEP YOUR PERSONAL DATA**

We retain personal data for as long as necessary to fulfil the purposes outlined in this Privacy Notice or as required by legal and regulatory obligations. Retention periods vary by data type and purpose, such as record-keeping requirements mandated by financial regulations.

## 9. **INTERNATIONAL DATA TRANSFERS**

Where we transfer your personal data to countries outside of Botswana without an adequacy decision, we ensure that appropriate safeguards are in place, such as standard contractual clauses, to maintain data protection standards or rely on permitted derogations for the transfer if necessary.

## 10. **AUTOMATED DECISION-MAKING AND PROFILING**

Certain decisions may be made automatically using your data (e.g., credit scoring). If applicable, we ensure these decisions are fair, transparent, and provide you with rights to request human intervention, express your views, or contest the decision.

## 11. **COOKIES AND ONLINE TRACKING**

When you use our online services, we may use cookies and similar technologies to enhance your experience, analyse usage, and support security. For more information, please refer to our **Cookie Policy** at <https://www.bankofbaroda.co.bw/cookie-policy> .

## 12. **UPDATES TO THIS PRIVACY NOTICE**

We may update this Privacy Notice periodically to reflect changes in our practices or legal requirements. Any updates will be posted on our website at [www.bankofbaroda.co.bw](http://www.bankofbaroda.co.bw), and we will notify you of significant changes directly if required by law.

## 13. **CONTACT INFORMATION**

If you have questions or concerns about this Privacy Notice or how we handle your personal data, please contact our Data Protection Officer (DPO):

### **Data Protection Officer**

Bank of Baroda (Botswana) Limited  
Plot 14456, Kamoshungo Road, Old Nokia Circle  
Gaborone West Industrial, Gaborone  
Email ID : [dpo.botswana@bankofbaroda.com](mailto:dpo.botswana@bankofbaroda.com)  
Contact Number: +267 3992706.

Alternatively, you may contact the following:

- a. your base branch where you keep your account (for customers);
- b. your resourcing consultant or HR Officer at Head Office (for job applicants);
- c. human resources (for employees);
- d. your manager at Head Office (for suppliers); or
- e. Baroda's Company Secretariat office (for directors).