

CUSTOMER PRIVACY NOTICE

At Old Mutual we are committed to protecting your privacy and to ensure that your personal information is collected and used properly, lawfully, and transparently in compliance with the Data Protection Act 2012 (Act 843).

This Notice explains how we obtain, use, and disclose your personal information and aims to inform you of your rights and how to exercise them.

This Notice sets out:

- Who we are
- What information we collect and from where we collect it
- The purposes for which we use your information
- Our aim to provide ongoing financial services
- To whom we disclose your information
- How we safeguard your information
- Your rights to access and correction and deletion of information
- Changes to this Notice
- How to contact us
- The Data Protection Commissions contact details

WHO WE ARE

In this Notice, "Old Mutual", "Old Mutual Group" or "we" refers to one or more of the companies/entities in the Old Mutual Group that operate in Ghana.

THE INFORMATION WE COLLECT

We collect and process your personal information mainly to provide you with access to our services and products, to help us improve our offerings to you and for certain other purposes explained below. For us to do this, you must provide us with the information that we request, failing which we cannot enter a relationship with you or assist you.

When you provide us with information about third parties (for example your spouse, beneficiaries and/or dependents), we will process their personal information to issue a policy/benefit and to pursue their legitimate interest. We will furthermore process personal information for the purposes set out in this Notice. You warrant that when you give us personal information about third parties, this information is accurate and correct and you have received their permission to share their personal information with us for the purposes set out in this Privacy Notice or any other related purposes. If you are giving consent for a person under 18 (a minor) you confirm that you are a competent person and that you have authority to give their consent on their behalf.

The type of information we collect will depend on the purpose for which it is collected and used. We will only collect information that we need for that purpose.

We collect information directly from you where you provide us with your personal details, for example when you apply for a product or services from us or when you submit enquiries to us or contact us.

We also collect information, including medical information, about you from other sources, such as:

- Third parties for the purposes listed below, for example medical institutions and law enforcement agencies.
- Other insurers to prevent fraudulent claims.
- Other companies in the Old Mutual Group for the purposes listed below, or when we believe it will enhance the services and products we can offer to you, but only where you have not objected to such sharing. This includes supplementing the information that you provide to us with information we receive from other companies in the Old Mutual Group to offer you a more consistent and personalized experience in your interactions with Old Mutual, and to ensure that we have updated information about you.

We have a duty to take all reasonably practicable steps to ensure your personal information is complete, accurate, not misleading and updated on a regular basis. To enable this, we will always try to obtain personal information from you directly, and we shall appreciate it if you would keep your personal information up to date and accurate. You can do so by contacting us at PrivacyInfo@oldmutual.com.gh whenever your details change. Where we are unable to obtain personal information from you directly, we will make use of verifiable independent third party data sources.

Website usage information is collected using "cookies" which allows us to collect standard internet visitor usage information. This includes information about how you logged on and from our website, including your IP address, information about your visit, your device information and how you use our website. This will include the capture of your approximate location information.

PURPOSES FOR WHICH WE USE YOUR INFORMATION

We will use your personal information only for the following purposes:

- To provide our products or services to you, to carry out the transaction you requested and to maintain our relationship
- For underwriting purposes
- To assess and process claims
- To confirm and verify your identity, address and banking details
- To verify that you are an authorised user for security purposes
- For maintaining the accuracy of your personal information
- For operational purposes
- For purposes of claim checks (e.g. Claims Registers)
- For the detection and prevention of fraud, crime, money laundering or other malpractice
- To trace you where you are uncontactable
- To conduct market or customer satisfaction research or for statistical analysis
- For audit and record keeping purposes
- Social responsibility
- In connection with legal proceedings.

We will also use your personal information to comply with legal and regulatory requirements or industry codes to which we subscribe, or which apply to us, or when it is otherwise allowed by law (for example to protect Old Mutual's interests).

We may also process your information, including personal and special personal information, to conduct sanction screening against all mandatory and non-mandatory sanctions lists, and we may communicate such personal information to local and international Regulatory Bodies as well as to other entities in the Old Mutual Group if you are matched to one of these sanctions lists.

ONGOING FINANCIAL SERVICES

Given our aim to provide you with ongoing financial services, we would like to use your information to keep you informed about other financial products and services which may be of particular interest to you.

We have made provision on our customer onboarding points to solicit for your consent with respect to direct marketing.

You may also tell us what your communication preferences are by contacting us at: PrivacyInfo@oldmutual.com.gh

DISCLOSURE OF INFORMATION

We may disclose your personal information to our service providers who are involved in the delivery of products or services to you. We have agreements in place to ensure that they comply with these privacy terms.

We may share your personal information with:

- Third parties for the purposes listed above, for example fraud prevention agencies, law enforcement agencies.
- Other insurers to prevent fraudulent claims.
- Other companies / entities in the Old Mutual Group and, where appropriate, Old Mutual sponsored retirement funds, for the purposes listed above, or when we believe it will enhance the services and products we can offer to you, but only where you have not objected to such sharing.
- Other third parties from whom you have chosen to receive marketing information.

We may also disclose your information:

- Where we have a duty or a right to disclose in terms of law or industry codes; or
- Where we believe it is necessary to protect our rights.

INFORMATION SECURITY

We are legally obliged to provide adequate protection for the personal information we hold and to stop unauthorised access and use of personal information. We will, on an ongoing basis, continue to review our security controls and related processes to ensure that your personal information is secure.

Our security policies and procedures cover:

- Physical security
- Computer and network security;
- Access to personal information
- Secure communications
- Security in contracting out activities or functions
- Retention and disposal of information
- Acceptable usage of personal information

- Governance and regulatory issues
- Monitoring access and usage of personal information
- Investigating and reacting to security incidents

When we contract with third parties, we impose appropriate security, privacy and confidentiality obligations on them to ensure that personal information that we remain responsible for, is kept secure.

We may wish to transfer your personal information to another country for processing or storage. We will ensure that anyone to whom we pass your personal information agrees to treat your information with the same level of protection as we are obliged to.

YOUR RIGHTS

We will take all reasonable steps to confirm your identity when you exercise your rights.

Access to information

You have the right to request a copy of the personal information we hold about you. To do this, contact us at PrivacyInfo@oldmutual.com.gh and specify what information you would like.

Please note that any such access request may be subject to a payment of a legally allowable fee.

Objection to processing

In certain cases, you have the right to object to the processing of your personal information. If you want to object, please contact us at PrivacyInfo@oldmutual.com.gh

Correction of your information

You have the right to ask us to update or correct your personal information. You may do this by contacting us at PrivacyInfo@oldmutual.com.gh.

Deletion of your information

You agree that we may keep your personal information until we destroy your information based on Old Mutual's destruction standards. You have the right to ask for deletion or destruction of your personal information – we will do that unless the law requires us to keep it or if we need it for legitimate business purposes. You may do this by contacting us at PrivacyInfo@oldmutual.com.gh.

Automated decision making

You agree that we may process your personal information by using automated means (without human intervention in the decision-making process) to decide about you or your application for any product or service you may query the decision made about you.

CHANGES TO THIS NOTICE

Please note that we may amend this Notice from time to time. Please check our website periodically to inform yourself of any changes.

HOW TO CONTACT US

If you have questions about this Notice or believe we have not adhered to it, or need further information about our privacy practices, please contact us at PrivacyInfo@oldmutual.com.gh.

DATA PROTECTION COMMISSION

You have the right to complain to the Data Protection Commission, whose contact details are:

<https://dataprotection.org.gh/>

Tel: **+233 (0) 302 222 929**

Fax: +233-(0)30 2222 927 +233-(0)506177979

Email: **info@dataprotection.org.gh**

East Legon, Paw Paw Street, GPS: GA-414-1469, P.O. Box CT7195, Accra

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