DPF
DEBSWANA • PENSION • FUND

MEMBER AND BENEFICIARY PRIVACY NOTICE

Debswana Pension Fund ("DPF","we","us","our") is a licensed retirement fund under the Retirement Funds Act, 2022 and the data controller for personal data processed in connection with your membership or benefits. The Fund is administered on our behalf by Mmila Fund Administrators Proprietary Limited ("Mmila"), which acts as our data processor. You can contact us at Private Bag 00512, Gaborone, by telephone at +267 361 4288, or our Data Protection Officer at dpfdataprotection@debswana.bw.

This Privacy Notice applies to members and beneficiaries and explains how we collect, use and disclose your personal data, and outlines your rights.

PURPOSE AND LEGAL BASIS FOR PROCESSING

We collect and process your personal data for the purposes set out below:

PURPOSE OF PROCESSING	EXAMPLES OF PERSONAL DATA PROCESSED	LEGAL BASIS
Managing membership, benefits, and beneficiary entitlements	Name, surname, former surname, title, gender, marital status, nationality, identity/passport number, date of birth, date joined fund, pension service date, date joined company, contribution history, investment choices, salary details, beneficiary details	Compliance with legal obligations (Retirement Funds Act, Fund Rules); Performance of a contract
Processing contributions, calculating and paying benefits	Bank account details, tax number, benefit details, contribution records	Compliance with legal obligations (Retirement Funds Act, Income Tax Act, Financial Intelligence Act)
Communicating with members and beneficiaries	Postal and residential address, email address, phone numbers, employment details	Compliance with legal obligations (Retirement Funds Act); Performance of a contract
Distribution of benefits on death or ill-health	Beneficiary names, relationship to member, date of birth, contact details, marital status, dependency details, health information	Compliance with legal obligations (Retirement Funds Act); Performance of a contract
Fraud prevention and security	Identification documents, login details, activity logs	Legitimate interest (fraud prevention and system security)
Strategic and investment planning	Contribution history, fund credit value, investment portfolio details	Legitimate interest (determine fund's strategic direction); Compliance with governance obligations

Where we rely on legitimate interests, we ensure the processing is necessary, proportionate, and does not unfairly affect your rights.

HOW WE COLLECT YOUR DATA

We collect your personal data directly from you (e.g., forms, correspondence, portal submissions), from your employer (for contribution reconciliation and employment verification), from our Fund Administrator, Mmila (for pension administration and records management), from members where you are a beneficiary, and from relevant third parties for benefit claims (e.g., dependents, next of kin).

MANDATORY PROVISION OF PERSONAL DATA

Certain personal data is required by law and/or the Fund Rules (e.g., identification, tax number, banking details). Without this data, we may not be able to process your membership or benefits.

RECIPIENTS OF PERSONAL DATA

We may share your personal data with:

i. Mmila, for day-to-day administration of the Fund;
ii. your employer, for contribution reconciliation and employment verification;
iii. regulatory authorities such as the Non-Bank Financial Institutions Regulatory Authority, Botswana Unified Revenue Service and others as required by law;
iv. professional advisors, including actuaries, auditors, investment advisors, tax consultants and legal advisors;
v. third-party service providers such as IT and data management providers, card production providers, and communication vendors;
vi. Insurers, for death, disability, or other benefit claims processing; and
vii. other parties lawfully entitled to receive the data under applicable laws.

INTERNATIONAL DATA TRANSFERS

In certain circumstances, we may transfer your personal data to countries outside Botswana as part of Fund administration and management. These transfers support the secure and efficient delivery of our services. For example, your personal data may be processed in South Africa by service providers, including actuaries and pension administration system providers. South Africa is recognised under the Data Protection Act as providing an adequate level of data protection, meaning its laws offer protections equivalent to those in Botswana.

Where personal data is transferred to a country without an adequacy decision, we will implement appropriate safeguards or, in limited cases, rely on lawful derogations (e.g., your consent, performance of a contract, or protection of vital interests) to ensure compliance with the Data Protection Act.

RETENTION OF PERSONAL DATA

We retain member and beneficiary records for the duration of the member's membership and for an indefinite period after the member's death to enable pension administration, payment of benefits to beneficiaries, and compliance with legal and governance requirements. Administrative and transaction records are retained for as long as required by applicable laws (e.g., tax, pension fund regulation). Once personal data is no longer required for the purposes for which it was collected, it will be securely deleted or anonymised in accordance with our internal retention and disposal policies.

YOUR DATA PROTECTION RIGHTS

You have the right to:

i. request access to the personal data we hold about you;
ii. request correction of any personal data that is inaccurate or incomplete;
iii. request deletion of your personal data in certain circumstances;
iv. request restriction of the processing of your personal data in certain circumstances;
v. object to the processing of your personal data where we rely on our legitimate interests; and
vi. Request the transfer of your personal data to you or to another party in a structured, commonly used format.

These rights may be limited depending on the legal basis and processing context. To exercise them, please contact us. You also have the right to lodge a complaint with the Information and Data Protection Commission.

AUTOMATED DECISION-MAKING

We do not use automated decision-making or profiling that produces legal or significant effects.

FURTHER PROCESSING

If we intend to process your personal data for a new purpose not stated in this Notice, we will inform you before doing so.

UPDATES TO THIS NOTICE

We may update this Privacy Notice from time to time to reflect legal or operational changes. The latest version will be available from the Fund Office and on request.