PRIVACY NOTICE FOR SUPPLIER REPRESENTATIVES, DIRECTORS, SHAREHOLDERS AND SOLE PROPRIETORS

Debswana Pension Fund ("DPF","we","us","our") is the data controller responsible for deciding why and how your personal data is processed in connection with supplier onboarding and management.

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 explains how we collect, use, and share your personal data when you act as a supplier/service provider representative, director, shareholder, or sole proprietor. It also informs you of your rights in relation to your data and how you may exercise them.

SOURCES OF PERSONAL DATA

We collect personal data from the following sources:

i. directly from you if you are a sole proprietor, through onboarding forms, correspondence, or other documentation you submit (such as copies of identity documents, proof of residential address, or proof of source of income); and
ii. from the supplier/service provider organisation in which you are the representative, director, shareholder or beneficial owner, as part of contractual or onboarding documentation.

PURPOSE AND LEGAL BASIS FOR PROCESSING

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

PURPOSE OF PROCESSING	EXAMPLES OF PERSONAL DATA PROCESSED	LEGAL BASIS
Verifying the identity and role of supplier representatives	Full name, contact details, position/designation	Legitimate interest (effective supplier relationship management and communication)
Verifying the identity of directors, shareholders and sole proprietors	Full names, copies of identity documents, proof of residential address, proof of source of income	Compliance with a legal obligation (Financial Intelligence Act)
Communicating with supplier representatives and sole proprietors	Email address, phone number	Legitimate interest (to facilitate supplier communication and engagement)
Conducting AML and KYC due diligence checks	Identity documents, proof of residence, proof of income, beneficial ownership details	Compliance with a legal obligation (Financial Intelligence Act)
Managing supplier records, governance and compliance	Supplier-related records and associated individuals	Legitimate interest (accountability, governance, and risk management)

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

MANDATORY PROVISION OF PERSONAL DATA

Certain personal data (such as identity documents, proof of residence, and proof of income) is required to comply with AML/KYC obligations under the Financial Intelligence Act. In addition, some information may be mandatory for tax compliance and to complete supplier onboarding. Without this data, we may be unable to onboard you or maintain a supplier relationship.

RECIPIENTS OF PERSONAL DATA

We may share your personal data with:

i. regulatory and supervisory authorities (e.g., Financial Intelligence Agency), as required by law;
ii. auditors, legal advisers, or consultants, to support compliance, governance, or investigations; and
iii. IT and system service providers who host, secure, and maintain supplier records.

INTERNATIONAL DATA TRANSFERS

In some cases, your personal data may be transferred outside Botswana. Where this occurs, we rely on adequacy decisions (where the destination country's laws are recognised as providing equivalent protection), appropriate safeguards, or permitted derogations (e.g., explicit consent, fulfilment of a contract, or protection of vital interests).

RETENTION OF PERSONAL DATA

We retain your personal data for as long as necessary to fulfil the purposes set out in this notice, comply with legal obligations, and maintain supplier records. In line with the Financial Intelligence Act, supplier-related records may be retained for up to 20 years after the end of the supplier relationship. When data is no longer required, it will be securely deleted or anonymised in line with our Data Retention and Disposal Policy.

YOUR DATA PROTECTION RIGHTS

You have the following rights:

i. Right of access – request confirmation and a copy of your personal data;
ii. Right to rectification – correct incomplete or inaccurate data;
iii. Right to erasure – request deletion of your data in certain cases;
iv. Right to restriction – limit processing under defined circumstances;
v. Right to object – object to processing based on our legitimate interests; and

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

UPDATES TO THIS NOTICE

We may update this Privacy Notice from time to time to reflect legal, regulatory, or operational changes. The latest version will be made available on our website or on request from our Finance team.