REFEREE PRIVACY NOTICE

Debswana Pension Fund ("DPF", "we", "us", "our") is the data controller responsible for deciding why and how your personal data is processed when you are nominated as a referee by a job applicant. 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 as part of the recruitment process.

SOURCES OF PERSONAL DATA

We collect personal data from the following sources:

i. directly from the job applicant when they nominate you as a referee; and
ii. directly from you, when you provide feedback during the reference-check process.

Where personal data is not obtained directly from you, we will inform you of the source and the categories of data collected, as required by the Data Protection Act.

PURPOSE AND LEGAL BASIS FOR PROCESSING

We process your personal data for the purposes below:

PURPOSE OF PROCESSING	EXAMPLES OF PERSONAL DATA PROCESSED	LEGAL BASIS
Assessing the job applicant's suitability for employment	Your name, contact details, professional position/title, and feedback provided	Legitimate interest (to verify the accuracy of information provided and assess applicant suitability)
Conducting recruitment verification and compliance checks	Reference feedback, employment history, character assessments	Legitimate interest (to ensure due diligence in recruitment and safeguard organisational integrity)

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

Providing referee information is part of the recruitment process. If you choose not to provide your feedback, this may affect the ability of the applicant to be considered for employment.

RECIPIENTS OF PERSONAL DATA

We may share your personal data with professional advisors (e.g., legal advisors) where necessary to address a recruitment-related dispute.

INTERNATIONAL DATA TRANSFERS

We do not routinely transfer referee data outside Botswana. Where this becomes necessary, we rely on adequacy decisions (where the destination country's laws are recognised as providing equivalent protection). In the absence of such a decision, we will implement appropriate safeguards or rely on specific derogations permitted under the Data Protection Act.

RETENTION OF PERSONAL DATA

We retain referee information for as long as necessary to complete the recruitment process and up to 6 months thereafter. Once the retention period expires, your data will be securely deleted or anonymised.

YOUR DATA PROTECTION RIGHTS

You have the following rights under the Data Protection Act:

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 how we process your data in defined circumstances.
v. Right to object – you have the right to object to processing based on our legitimate interests.

These rights may be limited depending on the legal basis for processing, or the rights of others. To exercise them, please contact us. 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 or operational changes. The latest version will be available on our website under recruitments or from our Human Resources office.